

JUL 12 1990

5HR-13

Edwin Lim, Manager
Engineering Section
Division of Solid and Hazardous Waste Management
Ohio Environmental Protection Agency
1800 WaterMark Drive
P.O. Box 1049
Columbus, Ohio 43266-0149

RE: Preliminary Review/Visual Site
Inspection Report
UCAR Carbon Company, Parma
OHD 003 926 748

Dear Ed:

Enclosed you will find a copy of the UCAR Carbon Company, Parma, Preliminary Review/Visual Site Inspection (PR/VSI) report prepared by A.T. Kearney, Inc., for the United States Environmental Protection Agency.

If you have any questions regarding this report, please contact Francine Norling of my staff, at (312) 886-6198.

Sincerely,

Daniel Patulski
Acting Chief
Ohio Permitting Section

cc: Greg Taylor, OEPA-NEDO

5HR-13:NORLING:bd:07/09/90:6-6198

Ucar-PR/VSI

| RCRA PERMITS | TYP. | AUTH. | IL. CHIEF | IN. CHIEF | MI. CHIEF | MN/WI CHIEF | OH. CHIEF | RPB CHIEF | O. R. A.D.D. | WMD DIR |
|--------------|-------|-------|-----------|-----------|-----------|-------------|-----------|-----------|--------------|---------|
| INIT. DATE | 07/09 | 7/10 | | | | | 08/11/90 | | | |

MAY 16 1990

5HR-13

D.A. Mieskowski, Manager
Health, Safety and Environmental Protection
UCAR Carbon Company, Inc.
P.O. Box 6116
Cleveland, Ohio 44101

RE: UCAR Carbon Company, Inc.
Parma, Ohio
OHD 003 926 748

Dear Mr. Mieskowski:

As you requested by telephone, I have enclosed a copy of the Preliminary Review/Visual Site Inspection (PR/VSI) Report for the UCAR Carbon Company facility in Parma, Ohio. This report was prepared by A.T. Kearney, under contract to the U.S. EPA.

The PR/VSI report determined that three of the observed Solid Waste Management Units (SWMUs) require further action, in addition to the units that are covered by the RCRA closure plan.

The area called Solid Waste Management Unit #5 (formerly Chemical Reacting Site) was determined to have a high potential for releases of hazardous constituents to the environment, based upon reports of former waste management practices and observation of stressed vegetation at the unit during the VSI. Therefore, it is recommended that soils in this area be sampled to determine if hazardous constituents are present in soils and to assess the potential for downward migration of constituents. In addition, SWMU #9 (Scrap Metal Dumpster) was determined to have a high potential for releases, based upon observations of oil-stained soils at the unit during the VSI. It is recommended that soil samples be taken at this area to determine if hazardous constituents are present and to assess the potential for downward migration. The unit was also observed to be in poor condition at the time of the VSI. It is recommended that this unit be repaired or replaced to prevent additional releases of oily liquids.

The potential for releases from SWMU #19 (Raw Material Dispensing Room Floor Drains) could not be determined, as the unit is below ground, and no file information exists on the destination or integrity of the drains. Therefore, it is recommended that this information should be determined, and that any observed problems should be corrected.

The U.S. EPA will use the results of the PR/VSI report to determine the priority of this facility for corrective action under the 1984 Hazardous and Solid Waste Amendments (HSWA), and may require that the recommendations in the report be implemented through corrective action at a future date. If UCAR decides to undertake the recommended actions voluntarily, a sampling plan should be submitted to the U.S. EPA for review and comment prior to undertaking any sampling.

Thank you for your cooperation with our contractor personnel during the VSI. If you have any questions, please contact me at, (312) 886-6198.

Sincerely,

Francine P. Norling
Environmental Scientist

cc: Greg Taylor, OEPA-NEDO
Ed Kitchen, OEPA

A.T. Kearney, Inc.
222 South Riverside Plaza
Chicago, Illinois 60606
312 648 0111
Facsimile 312 648 1939-2302

Management
Consultants

RECEIVED
MAR 29 1990

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

ATKEARNEY

March 29, 1990

Mr. Bernie Orenstein
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, IL 60604

Reference: EPA Contract No. 68-W9-0040; Work Assignment No.
R05-05-07; UCAR Carbon Company, Inc.; Parma, Ohio;
EPA I.D. No. OHD003926748; Addendum to Final
Deliverable

Dear Mr. Orenstein:

Enclosed please find an addendum to the above-referenced deliverable. During a telephone conversation with Francine Norling, the EPA WAM, and Grover Buhr on March 23, 1990 regarding UCAR Carbon Company, it was requested that Kearney provide clarification of the difference between the "preliminary" list of solid waste management units (SWMUs) and areas of concern (AOCs) included in the Proposed Visual Site Inspection Agenda (January 31, 1990) and the "final" list of SWMUs included in the Preliminary Review/Visual Site Inspection Report (PR/VSI) (March 22, 1990).

Attachment A provides the "preliminary" list of SWMUs and AOCs and the status of each SWMU/AOC after the VSI. In general, the changes involved either using a new SWMU name or deleting SWMUs and AOCs based on information gathered during the VSI. Attachment B provides the "final" list of SWMUs included in the PR/VSI report. The SWMUs identified during the VSI are denoted with an asterisk.

If you have any further questions regarding this PR/VSI, please do not hesitate to call me or Grover Buhr, who can be reached at 415/598-9390.

Sincerely,



Ann L. Anderson
Technical Director

3856E

Attachment

cc: F. Norling, EPA Region V
L. Pierard, EPA Region V
G. Taylor, OEPA
A. Williams (w/o enclosure)
A. Glazer

G. Buhr
L. Poe
P. Martz

ATTACHMENT A

List Of SWMUs And AOCs From
Proposed VSI Agenda and
Status After VSI

| <u>SWMUs</u> | <u>STATUS AFTER VSI</u> |
|---|--|
| 1. Hazardous Waste Container Storage Area No. 1 | No change |
| 2. Hazardous Waste Container Storage Area No. 2 | No change |
| 3. Hazardous Waste Container Storage Area No. 3 | No change |
| 4. Former Waste Chemical Handling Area | Name changed to "Former Chemical Reacting Site" (SWMU 5) |
| 5. Solid Waste Dumpster | Name changed to "Municipal Waste Dumpster" (SWMU 8) |
| 6. Lab Chemical Disposal Drain | Name changed to "Laboratory Chemical Disposal Piping" (SWMU 13) |
| 7. Underground Sewer Piping | Portions of unit of concern included as "Laboratory Chemical Disposal Piping" and "Raw Material Dispensing Room Floor Drains" (SWMUs 13 and 15) |
| 8. Sump No. 1 | According to facility representatives, these units do not exist as SWMUs. These sumps may refer to collection units in future drum storage units. |
| 9. Sump No. 2 | |
| <u>AOCs</u> | |
| A. Loading/Unloading Areas | Not SWMUs/AOCs; no evidence of release identified during VSI, during interviews with facility representatives, or during review of available file material |
| B. Underground Fuel Oil Storage Tanks (4) | |
| C. Underground Gasoline Storage Tank | |
| D. PCB Transformers (3) | |
| E. PCB Capacitor | |

ATTACHMENT B

List Of SWMUs From
PR/VSI Report for
UCAR Carbon Company

| <u>SWMUs</u> | <u>SWMU DESCRIPTION</u> |
|--------------|---|
| 1 | Hazardous Waste Container Storage Area No. 1 |
| 2 | Hazardous Waste Container Storage Area No. 2 |
| 3 | Hazardous Waste Container Storage Area No. 3 |
| 4* | Former Hazardous Waste Drum Storage Area |
| 5 | Former Chemical Reacting Site |
| 6* | Waste Dimethyl Sulfoxide Drum |
| 7* | Former Waste Dimethyl Sulfoxide Tank |
| 8 | Municipal Waste Dumpster |
| 9* | Scrap Metal Dumpster |
| 10* | Carbon Waste Dumpster |
| 11* | Satellite Scrap Graphite Accumulation Areas |
| 12* | Satellite Scrap Carbon Dumpster |
| 13 | Laboratory Chemical Disposal Piping |
| 14* | Raw Material Dispensing Room Leak Collection Cans |
| 15* | Raw Material Dispensing Room Floor Drains |

* Identified during Visual Site Inspection.

A.T. Kearney, Inc.
222 South Riverside Plaza
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Management
Consultants

March 20, 1990

Mr. Bernie Orenstein
Regional Project Officer
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, IL 60604

RECEIVED
MAR 21 1990
OFFICE OF RCRA
Waste Management Division
U.S. EPA REGION V
AT KEARNEY

Reference: EPA Contract No. 68-W9-0040; Work Assignment
No. R05-05-07; UCAR Carbon Company, Inc.,
Parma, Ohio; EPA ID No. OHD003926748; Final
Deliverable

Dear Mr. Orenstein:

Enclosed please find the Preliminary Review/Visual Site Inspection (PR/VSI) Report for the UCAR Carbon Company facility in Parma, Ohio. A total of 15 Solid Waste Management Units (SWMUs) were present at the facility. Based on our review of the SWMUs and the facility's waste-handling practices, eleven of the SWMUs have low or no potential for the release of hazardous wastes or constituents to the environment. No further action is suggested for these units.

Two SWMUs are considered to have a high potential for the release of hazardous wastes or constituents to the subsurface. These include the Former Chemical Reacting Site (SWMU 5) and the Scrap Metal Dumpster (SWMU 9). A RCRA Sampling Visit (SV) is suggested for each of these units.

The RCRA-regulated Hazardous Waste Storage Area No. 1 (SWMU 1) has a moderate potential for the release of hazardous wastes or constituents to the subsurface. Continued monitoring and implementation of the approved RCRA Closure Plan is suggested.

Mr. Bernie Orenstein
March 20, 1990
Page 2

The integrity of the Raw Material Dispensing Room Drains (SWMU 15) could not be determined during the VSI due to the in-ground and below-ground location of the unit. In addition, facility representatives could not provide documented confirmation regarding the destination of the drains, but assume that the drains connect to the sanitary sewer lines. Determination and documentation of the integrity of the unit is suggested. In addition, verification of the drainage destination is suggested.

Should you have any questions regarding this deliverable, please feel free to contact me at (312) 993-8814.

Sincerely,



Ann L. Anderson
Technical Director

Enclosure

| | |
|-------------------------------|----------------------|
| cc: F. Norling, EPA, Region V | G. Buhr |
| G. Taylor, OEPA | L. Poe |
| A. Williams (w/o encl.) | P. Martz (w/o encl.) |
| A. Glazer | B. Morson, SAIC |

3820E

PRELIMINARY REVIEW/VISUAL SITE INSPECTION REPORT

Union Carbide Corporation
UCAR Carbon Company, Inc.
Parma, Ohio

EPA I.D. No. OHD003926748

for:

Mr. Bernie Orenstein
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

Prepared by:

A.T. Kearney, Inc.
222 South Riverside Plaza
Chicago, Illinois 60606

EPA Contract No. 68-W9-0040
Work Assignment No. R05-05-07

March 20, 1990

Table of Contents

| | <u>Page</u> |
|--|-------------|
| I. Executive Summary | 1 |
| II. Introduction | 4 |
| III. General Description | 6 |
| A. Facility Description | 6 |
| B. Process Description | 8 |
| C. Waste Generation and Management | 11 |
| D. Regulatory History | 15 |
| D.1. RCRA | 15 |
| D.2. Air Quality | 18 |
| D.3. Water Quality | 19 |
| E. Environmental Setting | 19 |
| E.1. Meteorology | 19 |
| E.2. Flood Plain and Surface Waters | 21 |
| E.3. Soils and Geology | 22 |
| E.4. Ground Water | 23 |
| F. Receptors | 23 |
| IV. Solid Waste Management Units | 26 |
| 1. Hazardous Waste Container Storage Area No. 1 | 26 |
| 2. Hazardous Waste Container Storage Area No. 2 | 29 |
| 3. Hazardous Waste Container Storage Area No. 3 | 31 |
| 4. Former Hazardous Waste Drum Storage Area | 34 |
| 5. Former Chemical Reacting Site | 36 |
| 6. Waste Dimethyl Sulfoxide Drum | 38 |
| 7. Former Waste Dimethyl Sulfoxide Tank | 40 |
| 8. Municipal Waste Dumpster | 42 |
| 9. Scrap Metal Dumpster | 44 |
| 10. Carbon Waste Dumpster | 46 |
| 11. Satellite Scrap Graphite Accumu- lation Areas | 48 |
| 12. Satellite Scrap Carbon Dumpster | 50 |
| 13. Laboratory Chemical Disposal Piping | 52 |
| 14. Raw Material Dispensing Room Leak Collection Cans | 55 |
| 15. Raw Material Dispensing Room Floor Drains | 57 |

Table of Contents (Cont'd.)

| | <u>Page</u> |
|--|-------------|
| V. Summary of Suggested Further Actions | 59 |
| VI. References | 60 |

ATTACHMENTS:

- A. Solid Waste Management Unit Location Map for
 UCAR Chemical Company, Inc., Parma, Ohio
- B. VSI Summary
- C. Photograph Log

List of Figures

| | <u>Page</u> |
|--|-------------|
| III-1 - General Location Map of UCAR Carbon Company, Inc. | 7 |
| III-2 - General Facility Layout for UCAR Carbon Company, Inc. | 9 |
| III-3 - Wind Rose for UCAR Carbon Company, Inc. | 20 |

List of Tables

| | | <u>Page</u> |
|-------|---|-------------|
| I-1 | Solid Waste Management Units at UCAR Carbon Company, Inc. | 2 |
| III-1 | Hazardous Wastes Generated in Quantities Over 100 Kilograms/Year Identified in the December 1980 Part A Permit Application for UCAR Carbon Company | 13 |
| IV-1 | EPA Hazardous Waste Codes for Wastes Handled at Hazardous Waste Container Storage Area No. 1 | 27 |
| IV-2 | EPA Hazardous Waste Codes for Wastes Handled at Hazardous Waste Container Storage Area No. 2 | 32 |
| IV-3 | Inorganic Chemicals Which May be Disposed in Drain - Identified in the January 1989 Part B Permit Application | 53 |

I. EXECUTIVE SUMMARY

A RCRA Facility Assessment was conducted at the UCAR Carbon Company's facility in Parma, Ohio, to determine the need for corrective action. A Preliminary Review (PR) of files pertaining to the facility was performed in early February 1990. This was followed by a Visual Site Inspection (VSI) of the facility, conducted on February 12, 1990. This document constitutes the PR/VSI Report for the facility.

The UCAR Carbon Company is a research and development facility which investigates all phases of carbonization and graphitization processes. The majority of research and development work is conducted in a pilot plant and approximately 60 laboratories at the site. The UCAR Carbon Company began operations in 1956 as National Carbon Research Laboratories. The facility currently owns 62 contiguous acres of property.

Fifteen solid waste management units (SWMUs) were identified and examined during the VSI, and the potential for the release of hazardous wastes or constituents from each unit to the environment was assessed. Table I-1 presents a list of these SWMUs. Of the fifteen, two were determined to have high potential for release, one was determined to have a moderate potential for release, and one was determined to have an unknown potential for releases. The remaining eleven SWMUs have low or no potential for release to the environment.

TABLE I-1

Solid Waste Management Units
at UCAR Carbon Company, Inc.

| <u>SWMU No.</u> | <u>SWMU Description</u> | <u>RCRA Regulated</u> |
|-----------------|--|---------------------------|
| 1 | Hazardous Waste Container Storage Area No. 1 | Yes |
| 2 | Hazardous Waste Container Storage Area No. 2 | No |
| 3 | Hazardous Waste Container Storage Area No. 3 | Yes |
| 4 | Former Hazardous Waste Drum Storage Area | No |
| 5 | Former Chemical Reacting Site | No |
| 6 | Waste Dimethyl Sulfoxide Drum | No |
| 7 | Former Waste Dimethyl Sulfoxide Tank | No |
| 8 | Municipal Waste Dumpster | No |
| 9 | Scrap Metal Dumpster | No |
| 10 | Carbon Waste Dumpster | No |
| 11 | Satellite Scrap Graphite Accumulation Areas | No |
| 12 | Satellite Scrap Carbon Dumpster | No |
| 13 | Laboratory Chemical Disposal Piping | No |
| 14 | Raw Material Dispensing Room Leak Collection Cans | No |
| 15 | Raw Material Dispensing Room Floor Drains | No |

The Former Chemical Reacting Site (SWMU 5) was determined to have a high potential for the release of hazardous wastes or constituents to the subsurface, based on the former waste management practices and the observation of stressed vegetation at the site during the VSI. The Scrap Metal Dumpster (SWMU 9) was also determined to have a high potential for release of hazardous wastes or constituents to the subsurface, as evidenced by a dark oily substance observed on the soils adjacent to the unit during the VSI. A RCRA Sampling Visit is suggested for both units.

The RCRA-regulated Hazardous Waste Storage Area No. 1 (SWMU 1) was observed to have a moderate potential for releases to the subsurface based on documentation of past releases and poor integrity of the asphalt pad. Continued monitoring and implementation of the approved RCRA Closure Plan is suggested for this unit.

The integrity of the Raw Material Dispensing Room Drains (SWMU 15) could not be determined during the VSI due to the in-ground and below-ground location of the unit. In addition, facility representatives could not provide documented confirmation regarding the destination of the drains, but assume that the drains connect to the sanitary sewer lines. Determination and documentation of the integrity of the unit is suggested. In addition, verification of the drainage destination is suggested.

II. INTRODUCTION

The 1984 Hazardous and Solid Waste Amendments (HSWA) to the Resource Conservation and Recovery Act (RCRA) authorize the Environmental Protection Agency (EPA) to require corrective action for releases of hazardous waste and/or hazardous constituents from solid waste management units (SWMUs) and other areas of concern (AOCs) at all operating, closed, or closing RCRA facilities. The intent of this authority is to address previously unregulated releases to air, surface water, soil, and groundwater, and from the generation of subsurface gas. The first phase of the corrective action program as established by EPA is performance of a RCRA Facility Assessment (RFA). The RFA includes a Preliminary Review (PR) of available and relevant documents, a Visual Site Inspection (VSI), and, if appropriate, a Sampling Visit (SV).

This report summarizes the results of the PR and VSI phases of the RFA for UCAR Carbon Company, Inc., in Parma, Ohio. The findings in the report are based on a review of the file materials maintained at EPA Region V and at Ohio EPA including RCRA, Air, and Water files, and a Visual Site Inspection (VSI) conducted February 12, 1990.

Section III discusses the facility location and surrounding land use, history of ownership, process description, waste management operations, regulatory history, environmental setting, and potential receptors. The discussion of the facility's

environmental setting includes meteorology, flood plain and surface waters, soils and geology, and groundwater. A description of SWMUs at the facility, including conclusions regarding the release potentials for each unit are discussed in Section IV. Suggestions for further actions are given in Section V. References used to prepare this report are listed in Section VI. A map showing the locations of SWMUs at UCAR is presented in Attachment A. The VSI Summary and Photograph Log are included as Attachments B and C, respectively.

A total of 15 SWMUs were identified as a result of the assessment. Table I-1 lists the SWMUs identified during the PR/VSI.

III. GENERAL DESCRIPTION

A. FACILITY DESCRIPTION

The UCAR Carbon Company, Inc., Parma Technical Center, is located at 12900 Snow Road in Cuyahoga County, Ohio. Figure III-1 presents the location of the facility. Geographic coordinates for the facility are 41°24'30" north latitude, 81°46'30" west longitude. The UCAR Carbon Company is a subsidiary of Union Carbide Corporation. The EPA I.D. Number for the facility is OHD003926748 (Reference 3).

The site is composed of approximately 62 acres owned by Union Carbide Corporation on Snow Road in Parma, Ohio. The operating portion of the facility consists of approximately 334,200 square feet centrally located on the property (References 5 and 31). In addition to the UCAR Carbon Company, three tenants conduct small scale research and development operations at the site (Reference 31). These include Union Carbide Coatings Service Corporation, National Electric Carbon Company, and Amoco Performance Products, Inc. Operations other than research and development conducted at the site include customer technical/engineering services, business development, sales and marketing, and safety and health services (References 5 and 31).

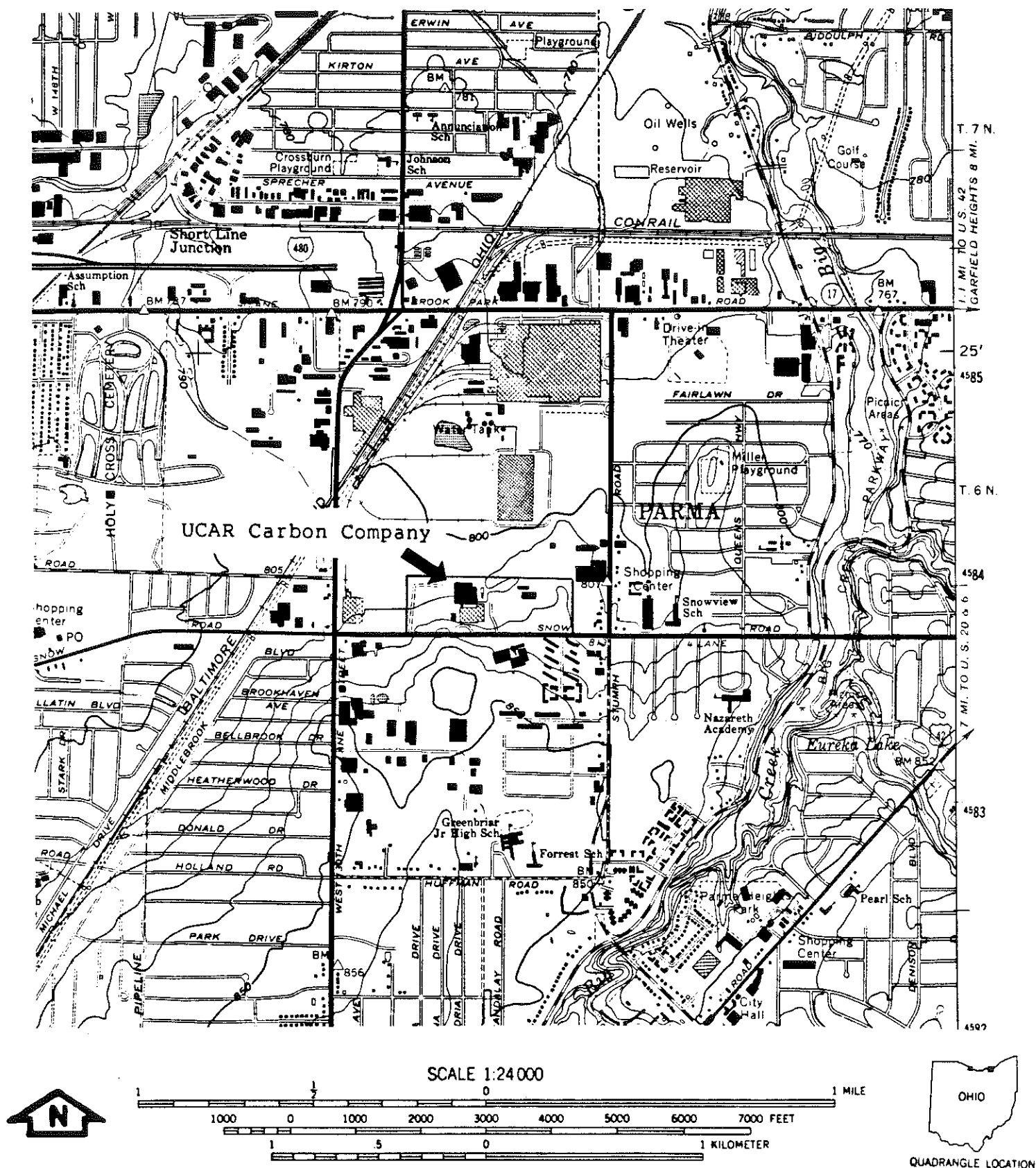


Figure III-1
 General Location Map for UCAR Carbon Company, Inc.
 Parma, Ohio
 (Adapted from Reference 44)

According to facility representatives, Union Carbide Corporation purchased the undeveloped land in 1955 and began research operations under the name of National Carbon Research Laboratory in 1956. This laboratory researched carbon and graphite, batteries, plating, electrolytes and ceramic solids. In 1959, the Battery Products Group was separated from the other operations and left the facility in 1982 (Reference 31).

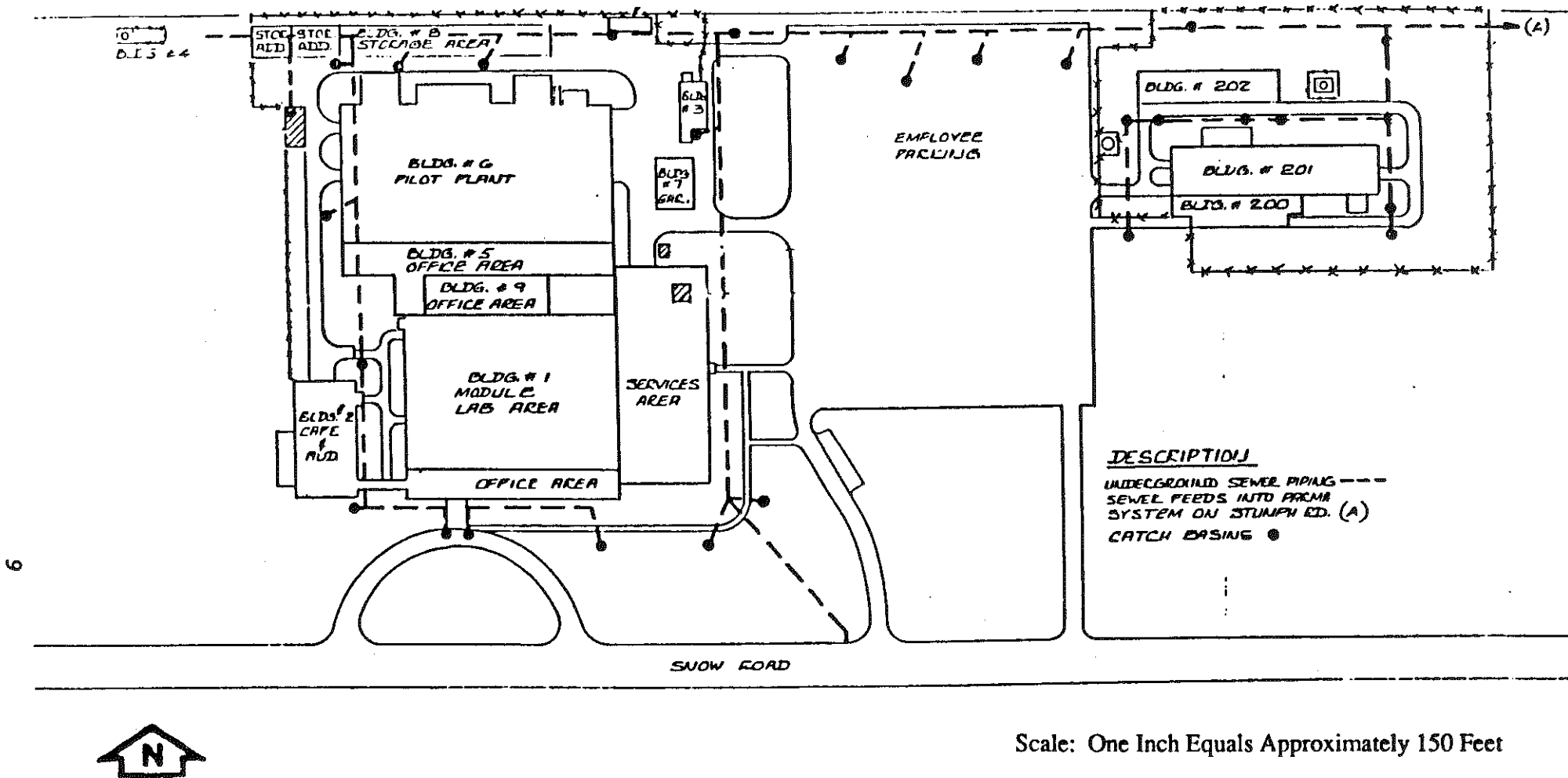
In 1965, the research and development laboratories were consolidated and a pilot plant was built. In 1975, the Controlled Line Facility (CLF) was built for manufacturing graphite. The CLF was closed in 1985. (Reference 31)

In 1986, the fiber operations were sold to Amoco and began operating as Amoco Performance Products. According to facility representatives, Amoco Performance Products is scheduled to relocate by the end of 1990 (Reference 30).

Figure III-2 provides the general facility layout and identifies building numbers at the site (Reference 4).

B. PROCESS DESCRIPTION

The primary function of the UCAR Carbon Company facility is research and development involving carbonization and graphitization processes (Reference 31). The majority of research and development work is conducted in Building No. 6 (Pilot Plant) and Building No. 1 (Module-Laboratory Area). The Pilot Plant is



Scale: One Inch Equals Approximately 150 Feet

Figure III-2

General Facility Layout for UCAR Carbon Company, Inc.
 Parma, Ohio
 (Adapted from Reference 4)

divided into work stations for baking, heat treating, milling and mixing, fiber coating, physical testing, small-scale manufacturing, and other research and development activities investigating all phases of carbon processes. (References 23, 31, 33)

The Module-Laboratory Area consists of approximately 60 active research and development laboratories. The laboratories conduct independent research and development and support the Pilot Plant activities (Reference 31). The types of laboratories include analytical and general chemistry, physical testing, nuclear magnetic resonance, developmental, and quality assurance (Reference 33).

The research and development at UCAR focuses on developing more cost effective ways to manufacture materials (primarily those containing carbon and graphite), and determining if cheaper raw materials can be effectively used in manufacturing. According to facility representatives, approximately 75 percent of research and development at UCAR involves studies with graphite electrodes. Studies are also conducted with carbon anodes, graphite oil, asbestos substitutes, carbon blocks for the aluminum industry, and carbon applications in the spectroscopic industry. (Reference 33)

Tenants at the facility use equipment and work space in the Pilot Plant and Module-Laboratory Area. Amoco Performance Products conducts research and development work with carbon fibers which involves polymerization, chemical reactions, pilot scale

reactions, and other product development activities (Reference 31). Union Carbide Coatings Service Corporation conducts research and development with ceramic material. National Electric Carbon Company conducts studies with carbon applications in brushes and seal rings (Reference 33).

UCAR formerly conducted manufacturing of high performance graphite for application in U.S. Navy missile systems at Building No. 201 (Control Line Facility). This facility was constructed in 1975 and closed down in December 1985 (Reference 31).

C. WASTE GENERATION AND MANAGEMENT

A variety of both hazardous and nonhazardous wastes are generated and stored at the facility. According to the December 1980 RCRA Part A Permit Application for UCAR, 164 types of hazardous wastes are stored in containers at the facility (Reference 15). The hazardous wastes managed in the largest quantities are acetone (U002) at 2,245 kilograms per year, ignitable waste (D001) at 2,014 kilograms per year, and toluene (U220) at 1,238 kilograms per year (Reference 15).

The remaining hazardous wastes are generated in quantities ranging from 0.0005 to 762 kilograms per year and consist of corrosive wastes, reactive wastes, wastes from nonspecific sources, and discarded commercial chemical products, off-specification species,

container residues, and spill residues (Reference 15). Table III-1 lists the hazardous wastes generated in quantities over 100 kilograms per year which were identified in the December 1980 RCRA Part A Permit Application (Reference 15).

Nonhazardous wastes include municipal wastes, scrap graphite, scrap carbon, and scrap metal. Municipal wastes include paper, cardboard, cleaned empty plastic and glass laboratory containers, and typical office wastes. According to the facility representative, approximately 1,920 cubic yards of these municipal wastes are generated per year (Reference 32). Approximately 850 cubic yards of scrap carbon (generated in the Pilot Plant), empty fiber drums, and old wooden pallets are generated each year, according to the facility representative (Reference 32). Approximately 1,240 cubic yards of scrap metal, which includes old equipment from the Pilot Plant and laboratories, old building steel from renovations, and miscellaneous scrap metal, are also generated each year (Reference 32). Scrap graphite is recycled off-site. Approximately 60,000 pounds of scrap graphite is generated each year, according to facility representatives (Reference 31).

The majority of wastes at UCAR Carbon Company are generated in the laboratories and Pilot Plant. Hazardous wastes are sent to Hazardous Waste Container Storage Area Nos. 1, 2, or 3 (SWMUs 1 through 3), then collected by a contracted hazardous waste transporter and sent to an off-site hazardous waste treatment or disposal facility (Reference 31).

Table III-1

Hazardous Wastes Generated in Quantities Over 100 Kilograms/Year
Identified in the December 1980 Part A Permit Application
for UCAR Carbon Company
(Reference 15)

| EPA Hazardous Waste No. | Description of Waste | Amount Managed (Kilograms) |
|-------------------------------|--|----------------------------------|
| D001 | Ignitable | 2,014 |
| D002 | Corrosive | 634 |
| D003 | Reactive | 120 |
| F001 | Spent halogenated solvents used degreasing | 150 |
| F002 | Spent halogenated solvents | 150 |
| F003 | Spent nonhalogenated solvents | 150 |
| F004 | Spent nonhalogenated solvents | 150 |
| F005 | Spent nonhalogenated solvents | 150 |
| F006 | Wastewater treatment sludges | 150 |
| F007 | Spent cyanide plating bath solutions | 150 |
| U002 | Acetone | 2,245 |
| U057 | Cyclohexanone | 515 |
| U077 | Ethylene dichloride | 208 |
| U125 | 2 - Furancarboxaldehyde | 762 |
| U151 | Mercury | 105 |
| U154 | Methanol | 492 |
| U159 | Methyl ethyl ketone | 624 |
| U196 | Pyridine | 159 |
| U213 | Tetrahydrofuran | 100 |
| U220 | Toluene | 1,238 |
| U228 | Trichloroethylene | 659 |
| U239 | Xylene | 209 |

Nonhazardous laboratory chemicals which are approved for drain disposal are diluted and disposed of in the Laboratory Chemical Disposal Piping (SWMU 13) (Reference 5). The chemicals are discharged to the sanitary wastewater sewer which transfers wastewater to the municipal publicly-owned treatment works (POTW). In the past, spent laboratory chemicals which reacted with water were sent to the Former Chemical Reacting Site (SWMU 5), an outdoor gravel-covered soil area located near the northeast corner of the employee parking lot (References 3, 31, 33). This unit ceased operating in the mid-1970s (Reference 31).

Scrap carbon and graphite generated in the Pilot Plant is collected in the Satellite Scrap Carbon Dumpster (SWMU 12) and Satellite Scrap Graphite Accumulation Areas (SWMU 11). These collection units are located inside the Pilot Plant near the points of generation of the scrap material. They are moved when scrap materials are generated in new locations in the plant (References 31, 32). Scrap carbon is sent to the Carbon Waste Dumpster (SWMU 10) for storage prior to pick up by a contractor. The carbon is disposed in a municipal sanitary landfill (Reference 32). Scrap graphite is recycled off site, either by Union Carbide or a private recycler (Reference 32).

Amoco Performance Products operates the Polyacrylonitrile Reactor Process in Room 10E of Building No. 1. Approximately six drums per year of wastewater containing dimethyl sulfoxide, polyacrylonitrile, and water are generated in the reaction process (Reference 31). The wastewater is currently collected in the Waste Dimethyl Sulfoxide Drum (SWMU 6) prior to storage in

Hazardous Waste Container Storage Area No. 2 (SWMU 2). From 1982 to early 1985, the wastewater was collected in the Former Waste Dimethyl Sulfoxide Tank (SWMU 7) (References 31, 33).

General facility wastes, including municipal wastes and scrap metal, are collected in dumpsters at UCAR Carbon Company. The Municipal Waste Dumpster (SWMU 8) is an outdoor unit located northeast of the shipping and receiving door at the north end of Building No. 1. Municipal wastes are picked up by a contractor and sent to a municipal sanitary landfill (Reference 31). The Scrap Metal Dumpster (SWMU 9) is an outdoor unit located north of Building No. 3. Scrap metal is picked up by a contractor for salvaging off-site (Reference 31).

D. REGULATORY HISTORY

D.1. RCRA

Union Carbide Corporation, Parma Technical Center, received approval for their Part A application from the EPA Hazardous Waste Facility Approval Board on November 30, 1981, to operate under interim status as a hazardous waste management facility (References 1, 15).

On April 28, 1982, Union Carbide Corporation submitted a completed Part B of the Ohio EPA Annual Report, which is required for generators and TSD facilities, to Ohio EPA (Reference 22).

According to an incident report submitted to the Ohio EPA on June 18, 1984, two drums in the Hazardous Waste Container Storage Area No. 1 (SWMU 1) expanded due to hot weather. Liquid epoxy resin began to solidify (an exothermic reaction) opening one 55-gallon drum and releasing steam, carbon monoxide and carbon dioxide. The second 55-gallon drum had deformed but did not open. There were no injuries and the two drums of solid epoxy resin were landfilled, according to the report. (Reference 19)

In December 1985, the Ohio EPA conducted an annual inspection for compliance with Ohio's regulations pertaining to the generation and storage of regulated hazardous wastes. In a letter dated January 16, 1986, from the Ohio EPA to Union Carbide, several violations were noted. These included: failure to mark drums with an accumulation date, failure to properly document drum and container inspections, inappropriate use of Waste Code Numbers, and failure to comply with applicable rules for their personnel training program. In addition, several deficiencies with the Contingency Plan were noted. These included an insufficient facility diagram and emergency response procedures. It was also noted that the Contingency Plan should state that incident reports be submitted to the Ohio EPA and that UCAR Carbon Company should explore the potential need for outside emergency response contractors or equipment. (Reference 16)

Union Carbide Corporation responded on March 6, 1986, to the Ohio EPA regarding these violations by reportedly providing the information requested (Reference 17).

According to a letter from Union Carbide to Ohio EPA dated November 17, 1988, Union Carbide submitted a Part B permit application in October 1988 to the Ohio EPA. In November 1988, a permit change request was submitted to upgrade storage requirements by purchasing two Safety Storage Buildings (Reference 8). In February 1989, a revised Part B permit application was submitted (Reference 5).

According to a letter from the Ohio EPA to Union Carbide dated February 7, 1989, an annual inspection for compliance with state and federal hazardous waste regulations was conducted by Ohio EPA in January 1989. Violations described in the Ohio EPA report include the following: storage of an open waste solvent container in the storage shed outside the shipping and receiving department (SWMU 2) and development of an insufficient waste analysis plan regarding the frequency in which analysis of the waste will be reviewed or repeated (Reference 12). According to a letter dated March 17, 1989, from Ohio EPA to Union Carbide, Union Carbide submitted the required compliance documentation on March 3, 1989, and returned to compliance (Reference 13).

On March 3, 1989, UCAR Carbon Company submitted a closure plan to Ohio EPA for Hazardous Waste Container Storage Area Nos. 1 through 3 (SWMUs 1 through 3) (Reference 4). In a letter dated August 18, 1989, the Ohio EPA disapproved the closure plan (Reference 9). In September 1989, UCAR Carbon Company submitted a revised closure plan for Hazardous Waste Storage Area Nos. 1 and 3 (SWMUs 1 and 3) addressing the deficiencies (Reference 29). Hazardous Waste

Area No. 2 (SWMU 2) was not included in this plan since it was determined that this unit was a less-than-90-day storage area. According to facility representatives during the VSI, the Ohio EPA approved the closure plan in January 1990 (Reference 31).

In May 1989, the Ohio EPA representing the U.S. EPA conducted a RCRA Land Disposal Restriction Compliance Inspection. The facility was found to be in compliance with the land disposal requirements (Reference 10).

Currently, UCAR Carbon Company plans to store all hazardous wastes for less than 90 days, and has petitioned to rescind the Part B application for the facility (Reference 30).

D.2. Air Quality

According to information obtained from the Ohio Division of Air Pollution Control, Union Carbide has 15 boiler permits, eight process permits and two tank permits for the UCAR Carbon Company facility (Reference 23). The permitted process units (which are considered air emission sources) include baking furnaces, milling and mixing operations, sagger loading and unloading of carbon billets, and other small scale air emission source operations (Reference 23). According to facility representatives, UCAR Carbon Company has not been issued any violations of their air permits (Reference 33).

D.3. Water Quality

UCAR Carbon Company discharges sanitary wastewater to the Northeast Ohio Sewer District Wastewater Treatment Plant. According to facility representatives during the VSI, UCAR Carbon Company has not been issued any violations by the local sewer district (Reference 31).

E. ENVIRONMENTAL SETTING

E.1. Meteorology

The climate of the Parma, Ohio area is continental in nature, characterized by moderate extremes of temperature and precipitation. Summers are moderately warm and humid, with temperatures occasionally exceeding 100°F. Winters are cold, with an average of about five days of subzero weather. Cool and dry weather prevails throughout most of the autumn. The mean annual temperature is 50.1°F in Cleveland, Ohio, located approximately 10 miles northeast of the facility. (Reference 41)

Average annual precipitation in the Parma/Cleveland area is 35.40 inches. The wettest month is June and the driest month is February. The maximum monthly precipitation on record is 9.50 inches occurring in October 1954. Most of the precipitation is supplied by weather systems moving northward from the Gulf of Mexico. Figure III-3 presents the typical wind speeds and directions in the Parma, Ohio area (Reference 41).

WIND DIRECTION VS. WIND SPEED (Percent Frequency of Observations)

Average Wind Speed
(Knots)

6.6 - 7.5
7.6 - 8.5
8.6 - 9.5
9.6 - 11.0



Cleveland Hopkins Intl. Airport
Period of Record 1965-74 20163 Observations

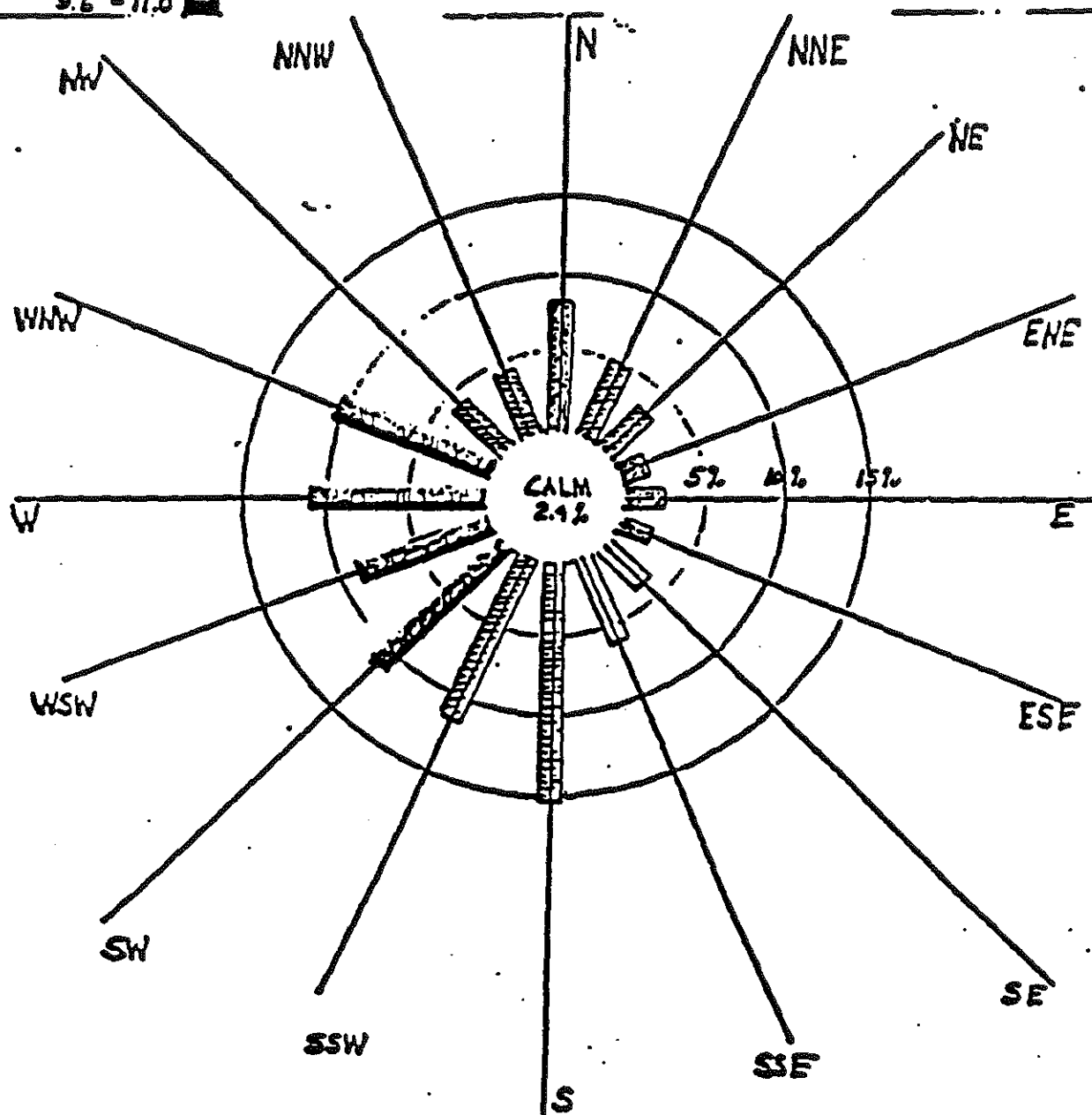


Figure III-3

Wind Rose for UCAR Carbon Company, Inc.
(Reference 5)

E.2. Flood Plain and Surface Waters

Cuyahoga County extends from the dissected northwestern margin of the Appalachian Plateaus across the Portage Escarpment to the Lake Plain in the Central Lowland province. Deeply incised north-flowing streams provide steep slopes and erosional topography, with relief up to 400 feet between valley floors and adjacent uplands. The varied preglacial physiography strongly influences the character and distribution of the glacial surface features. Thin drift over resistant bedrock masks the erosional topography on the Escarpment and on the uppermost parts of the Plateau. Prominent terraces in the valleys of deeply incised streams are erosional remnants of lacustrine and fluviatile deposits that accumulated in the valleys at times of glacial ponding. (Reference 39)

The UCAR facility is not located in a 100-year flood plain (Reference 5). No natural or man-made surface water bodies exist on facility property, or within 2,000 feet of the facility property line. The nearest surface water is Big Creek approximately 4,000 feet to the east/southeast of the facility. Figure III-1 is a topographic map detailing the land contours, surface water, surface water flow, and intermittent streams (Reference 44).

E.3. Soils and Geology

Soils in Cuyahoga County have developed upon Wisconsin-age glacial material and consist of a surface layer of dark grayish brown, friable silt loam about 7 inches thick, a subsoil of yellowish brown to dark yellowish brown and olive brown silty clay loam about 32 inches thick that is mottled and firm, and the substratum of olive brown, firm silty clay loam and clay loam to a depth of 60 inches. (Reference 42)

The UCAR Carbon Company facility is located on soils identified as the Mahoning silt loam and Condit silty clay loam. These are deep soils of low permeability and poor drainage, with seasonally perched high water tables at the surface in depressions to 30 inch depth on higher ground. The clays in the soil are of low plasticity. The soils drain slowly to surface channels and storm sewer systems. (Reference 42)

The soils are developed over glacial deposits and grade to these deposits at depths of approximately five feet (Reference 42). Glacial sediments underlying the site consist of the Lavery Till. The Lavery Till is a predominantly fine-grained till, with generally less than 20 percent sand in an evenly proportioned silt-clay matrix. At no great depth the till overlies sandstone, siltstone and shale members of the Ohio Shale and Bedford Shale. These rocks are exposed south of Snow Road and east of the developed UCAR Carbon Company site. (References 39, 40, and 42)

E.4. Ground Water

Ground-water resources in the area occur primarily in glacial deposits, secondarily in carbonate bedrock aquifers and least abundantly in sandstone bedrock aquifers. Recharge to the aquifers is from snowmelt and rainfall infiltrating and percolating through the glacial deposits. These deposits generally consist of up to 40 feet of unconsolidated sands and gravels deposited in outwash plains. These course-grained sediments are highly permeable as a result of primary porosity. Permeabilities in the bedrock aquifers are caused by secondary solution processes (References 36).

Soils and underlying glacial deposits at the UCAR site are composed of low permeability, poorly-drained silty clays and tills (References 35, 40, and 42). No wells are located at the site, and the nearest include two wells located on Hoffman Road approximately one half mile southeast of the site. The water table at these has been detected at a depth of 8 and 10 feet in the Berea Sandstone, which is not present under the site (References 37, 38, and 39). As stated above, soils at the site are poorly drained and drain to surface features. Water supplies in the Parma area are generally taken from Lake Erie (Reference 5).

F. RECEPTORS

The UCAR Carbon Company facility is located in western Parma, Ohio approximately 10 miles southwest of downtown Cleveland, Ohio. It

is situated in an area used for industry, retail businesses, office complexes, residential areas, and scattered wooded lots. The Chamber of Commerce of Cuyahoga County, Ohio reported the population of Parma at 89,460, and Cuyahoga County at 1,445,400, according to 1986 estimates (References 45).

The facility is bordered by a Chevrolet manufacturing facility to the north, a wooded parcel and a gasoline station to the east, a wooded parcel to the west, and a wooded parcel and a Kaiser-Permanente office complex across Snow Road to the south (References 30, 31). A school is located approximately one-half mile east of the site, and Cleveland-Hopkins International Airport is located approximately four miles west of the site (Reference 44).

The nearest potential surface water receptor is Big Creek, a stream located approximately 4,000 feet east/southeast of the site (Reference 44).

Based on known geological characteristics of the site, the water table under the facility is expected to be shallow, between the surface and 10 feet, depending on the season. This shallow, perched water probably has no communication with deeper aquifers, but drains to surface waters. However, no site-specific hydrogeologic investigations were available for review. (References 36, 37, 38, 39, 40, and 42).

The prevailing wind is from the southwest, according to the wind rose provided with the 1989 Part B Permit Application (Reference 5). According to the USGS "Lakewood, Ohio" quadrangle, the nearest residences downwind are approximately one-half mile from the site (Reference 44).

IV. SOLID WASTE MANAGEMENT UNITS

1. UNIT NAME: Hazardous Waste Container Storage Area No. 1
(Photograph Numbers 1.1 and 1.2)

Unit Description: This outdoor unit is an asphalt-covered area approximately 32 feet long by 16 feet wide located west of Building No. 6. This unit is the RCRA-regulated "final" storage area for hazardous waste prior to off-site removal. It is designed to accommodate a maximum of fifty 55-gallon drums of hazardous waste (Reference 29). According to the September 1989 "Closure Plan for Container Storage Areas," the asphalt area and underlying soils to the west of this unit will be tested for contamination. Remedial measures will be initiated if contamination is detected as part of the closure plan for this unit (Reference 29). During the VSI, severely corroded asphalt was observed at this unit (Reference 21).

Date of Start-up: This unit began operating in approximately 1980 (Reference 32).

Date of Closure: This unit is currently in operation (Reference 31).

Wastes Managed: This unit manages the ignitable hazardous wastes, hazardous wastes from nonspecific sources, and discarded commercial chemical products, off-specification species, container residues, and spill residues which are presented in Table IV-1 (Reference 29).

Release Controls: No release controls were identified for this unit which is located outdoors and constructed of a now-corroded asphalt base (Reference 31).

Table IV-1

EPA Hazardous Waste Codes for Wastes
Handled at Hazardous Waste Container Storage Area No. 1
(Reference 29)

| | | | | |
|------|------|------|------|------|
| D001 | F001 | U002 | U228 | U031 |
| D002 | F002 | U069 | U196 | |
| D003 | F003 | U220 | U239 | |
| | F004 | U159 | U056 | |
| | F005 | U154 | U019 | |
| | | U125 | U161 | |

1. UNIT NAME: Hazardous Waste Container Storage Area No. 1 -
(Cont'd.)

History of Releases: On June 10, 1984, epoxy resin in two 55-gallon drums began to solidify during hot weather. Expansion of the resin opened one 55-gallon drum which released carbon monoxide, carbon dioxide, and steam. Water was used to dissipate the heat of reaction and the fume. The second 55-gallon drum deformed but did not open (Reference 19). According to a 1984 Ohio EPA inspection report, two drums containing non-hazardous heat transfer fluid and lapping oil were observed to be leaking (Reference 21).

Conclusions: Soil/Ground Water: The release potential to the soil/ground water is moderate due to the deteriorated asphalt, outdoor location, and age of the unit.

Surface Water: The release potential to surface water is low due to the distance to the nearest surface water body.

Air: The past release potential to air is medium due to the documented reaction at this unit. The current release potential to air is low due to the closed nature of containers at this unit.

Subsurface Gas: The potential for generation of subsurface gas is low based on the above-ground location and closed nature of containers at the unit.

2. UNIT NAME: Hazardous Waste Container Storage Area No. 2
(Photograph Number 2)

Unit Description: This outdoor unit is a steel storage shed approximately 10 feet long by 5 feet wide by 10 feet high located northwest of the shipping and receiving area at Building No. 1. This unit has steel lockable doors, a concrete base, and an approximately one-inch high curb at the entrance (Reference 31). The unit has a capacity of approximately 10 55-gallon drums. It is used for less-than-90-day storage of steel 55-gallon drums of waste solvents, waste oil, waste tar and pitch, waste polyacrylonitrile and dimethyl sulfoxide (Reference 31). During the VSI, dark staining was observed on the walls and base of this unit; however, no evidence of release to adjacent soils was identified (Reference 31).

Date of Start-up: This unit began operating in approximately 1980 (Reference 32).

Date of Closure: This unit is currently in operation (Reference 31).

Wastes Managed: This unit manages waste solvents, including toluene, acetone, and quinoline; waste oil; waste tar and pitch; and waste polyacrylonitrile and dimethyl sulfoxide (Reference 31.)

Release Controls: This unit is an enclosed steel building (Reference 31).

History of Releases: No evidence of past release was identified during the VSI or through review of the available file material.

Conclusions: Soil/Ground Water: The release potential to soil/ground water is low due to the enclosed nature of the unit.

2. UNIT NAME: Hazardous Waste Container Storage Area No. 2 -
(Cont'd.)

Conclusions: Surface Water: The release potential to surface water is low due to the enclosed nature of the unit and the distance to the nearest surface water body.

Air: The release potential to air is low due to the closed nature of containers at this enclosed unit.

Subsurface Gas: There is no potential for generation of subsurface gas due to the enclosed above-ground location of this unit.

3. UNIT NAME: Hazardous Waste Container Storage Area No. 3
(Photograph Number 3)

Unit Description: This indoor unit is a 9-foot-wide by 18-foot-long storage area located at Room 10B at the north end of the Services Area of Building No. 1 (Reference 29). The unit is constructed with concrete block walls and a concrete floor. It is used to store waste commercial chemicals other than waste oils or solvents. The unit has a steel door and can accommodate approximately 38 55-gallon drums. According to the September 1989 "Closure Plan for Container Storage Areas," this unit will be decontaminated as part of closure (Reference 29). During the VSI, the only wastes stored at this unit were several jars of bromoform and two 30-gallon steel drums of asbestos fibers (Reference 31).

Date of Start-up: This unit began operating in approximately 1980 (Reference 32).

Date of Closure: This unit is currently in operation (Reference 31).

Wastes Managed: This unit manages the ignitable hazardous wastes, hazardous wastes from nonspecific sources, and discarded commercial chemical products, off-specification species, container residues, and spill residues which are presented in Table IV-2 (Reference 29).

Release Controls: This unit is located indoors and is constructed with concrete block walls, a concrete floor, a concrete dike at the entrance, and steel doors (Reference 29 and 31).

History of Releases: No evidence of past release was identified during the VSI or through review of the available file material.

Table IV-2

EPA Hazardous Waste Codes for Wastes
 Handled at Hazardous Waste Container Storage Area No. 3
 (Reference 29)

| | | | | | | |
|------|------|------|------|------|------|------|
| D001 | F001 | P022 | U002 | U080 | U162 | U108 |
| D002 | F002 | P030 | U003 | U092 | U165 | U103 |
| D003 | F003 | P048 | U009 | U122 | U169 | U050 |
| D004 | F004 | P077 | U019 | U123 | U170 | U105 |
| D005 | F005 | P120 | U031 | U125 | U188 | U104 |
| D007 | F007 | P098 | U037 | U133 | U190 | U020 |
| D008 | | P016 | U044 | U144 | U196 | U013 |
| D009 | | P079 | U045 | U146 | U210 | U217 |
| D011 | | P012 | U052 | U147 | U211 | U223 |
| D006 | | P053 | U056 | U151 | U213 | U147 |
| | | P121 | U067 | U154 | U219 | U107 |
| | | P105 | U069 | U155 | U220 | U061 |
| | | P124 | U070 | U159 | U226 | U134 |
| | | P029 | U072 | U160 | U228 | U135 |
| | | P098 | U077 | U161 | U239 | U006 |
| | | P115 | | | | U216 |
| | | P106 | | | | U057 |

3. UNIT NAME: Hazardous Waste Container Storage Area No. 3 -
(Cont'd.)

Conclusions: Soil/Ground Water: The release potential to soil/ground water is low due to the indoor location of the unit on a concrete floor.

Surface Water: There is no release potential to surface water due to the indoor location of the unit on a concrete floor and the distance to the nearest surface water body.

Air: The release potential to air is low due to the closed nature of containers, and indoor location of this unit.

Subsurface Gas: There is no potential for generation of subsurface gas due to location of this unit on a concrete floor.

4. UNIT NAME: Former Hazardous Waste Drum Storage Area
(Photograph Number 4)

Unit Description: This indoor unit was a storage area approximately five feet long by three feet wide located in the northwest corner of the shipping and receiving room. According to facility representatives, two drums used for accumulation of waste solvents and waste oils were stored at this location. During the VSI, minor dark staining was observed in the vicinity of this unit; however, no evidence of a release outside the area was identified (Reference 31).

Date of Start-up: This unit began operating in approximately 1956 (Reference 33).

Date of Closure: This unit ceased operating in approximately 1980 (Reference 33).

Wastes Managed: This unit managed waste solvents generated in the laboratories and waste oils generated in the Pilot Plant and by maintenance personnel.

Release Controls: This unit is located within a building on a concrete floor (Reference 31).

History of Releases: No evidence of past release was identified during the VSI or through review of the available file material.

Conclusions: Soil/Ground Water: The release potential to soil/ground water is low due to the indoor location of the unit on a concrete floor.

Surface Water: There is no release potential to surface water due to the indoor location of the unit on a concrete floor and the distance to the nearest surface water body.

4. UNIT NAME: Former Hazardous Waste Drum Storage Area
(Cont'd.)

Conclusions: Air: The release potential to air is low due to the closed nature of containers, and indoor location of this unit.

Subsurface Gas: There is no potential for generation of subsurface gas due to location of this unit on a concrete floor.

5. UNIT NAME: Former Chemical Reacting Site
(Photograph Number 5)

Unit Description: This outdoor unit was an approximately 10-foot-long by 10-foot-wide gravel-covered area located east of the northeast corner of the employee parking lot (References 3, 31). It was reportedly used to react and dilute small quantities of spent laboratory chemicals which react with water. The spent chemicals were reportedly placed on the gravel until the reaction was complete. According to facility representatives, several wheelbarrow loads of gravel were removed from this unit, dispersed on the site of the present parking lot, and paved over with asphalt. During the VSI, evidence of stressed vegetation in a rectangular configuration at the site of this unit was observed (Reference 31).

Date of Start-up: Although facility representatives could not provide the exact date of start-up, this unit may have begun operating in the 1960s (Reference 31).

Date of Closure: This unit ceased operating in the mid-1970s (Reference 31).

Wastes Managed: This unit managed small quantities of laboratory chemicals which could be reacted or diluted with water. According to the facility representative, chemicals disposed of included sodium metal, picric acid, nitrocellulose, organic peroxide, and other unstable organic salts and solvents (Reference 33).

Release Controls: No release controls were used for this unit which was located outdoors on natural soils (Reference 31).

5. UNIT NAME: Former Chemical Reacting Site - (Cont'd.)

History of Releases: This unit was designed as an area where spent laboratory chemicals were placed on gravel and allowed to react. During the VSI, evidence of stressed vegetation (brown grass) was observed at the site of this unit (Reference 31).

Conclusions: Soil/Ground Water: The release potential to soil/ground water is high based on the practice of reacting laboratory chemicals at this unit, the unlined nature of the unit, and the stressed vegetation observed during the VSI.

Surface Water: The release potential to surface water is low due to the distance to the nearest surface water body.

Air: The past release potential to air is high based on the practice of reacting laboratory chemicals at this unit, and the outdoor location of this unit. The current release potential to air is low based on the inactive nature of the unit.

Subsurface Gas: The potential for generation of subsurface gas is moderate based on the organic nature of chemicals managed at this unit.

6. UNIT NAME: Waste Dimethyl Sulfoxide Drum
(No photograph taken)

Unit Description: This indoor unit is an approximately 55-gallon plastic drum located in Room 10E (Polyacrylonitrile Reactor Room) in the northeast corner of the Services Area of Building No. 1. It is used to collect wastewater containing dimethyl sulfoxide, polyacrylonitrile, and water generated in the Polyacrylonitrile Reactor Operations (Reference 31). During the VSI, minor staining was observed on the floor in the vicinity of this unit; however, no evidence of release outside Room 10E was identified (Reference 31).

Date of Start-up: This unit began operating in early 1985 (Reference 33).

Date of Closure: This unit is currently in operation (Reference 31).

Wastes Managed: This unit manages wastewater containing dimethyl sulfoxide, polyacrylonitrile, and waste generated in the Polyacrylonitrile Reactor Operations. According to the facility representatives, approximately six drums of wastewater are generated per year (Reference 31).

Release Controls: This unit is located within a building on a concrete floor (Reference 31).

History of Releases: No evidence of past release was identified during the VSI or through review of the available file material.

Conclusions: Soil/Ground Water: The release potential to soil/ground water is low due to the indoor location of the unit on a concrete floor.

Surface Water: There is no release potential to surface water due to the indoor location of the unit on a concrete floor and the distance to the nearest surface water body.

6. UNIT NAME: Waste Dimethyl Sulfoxide Drum - (Cont'd.)

Conclusions: Air: The release potential to air is low due to the closed nature of the drum and indoor location of this unit.

Subsurface Gas: There is no potential for generation of subsurface gas due to location of this unit on a concrete floor.

7. UNIT NAME: Former Waste Dimethyl Sulfoxide Tank
(Photograph Number 7)

Unit Description: This indoor unit is an approximately 500-gallon above-ground steel tank located in Room 10E (Polyacrylonitrile Reactor Room) in the northeast corner of the Services Area of Building No. 1. It is used to collect wastewater containing dimethyl sulfoxide, polyacrylonitrile, and water generated in the Polyacrylonitrile Reactor Operations (Reference 31). According to facility representatives, the unit was taken out of service due to corrosion in early 1985 (Reference 33). During the VSI, evidence of leakage of wastewater was observed on the side of the tank and on the floor in the vicinity of the unit; however, no evidence of a release outside Room 10E was identified (Reference 31).

Date of Start-up: This unit was installed in August 1982 (Reference 33).

Date of Closure: This unit ceased operating in early 1985 (Reference 33).

Wastes Managed: This unit manages wastewater containing dimethyl sulfoxide, polyacrylonitrile, and waste generated in the Polyacrylonitrile Reactor Operations. According to the facility representatives, approximately six drums of wastewater are generated per year (Reference 31).

Release Controls: This unit is located within a building on a concrete floor (Reference 31).

History of Releases: No evidence of past release was identified during the VSI or through review of the available file material.

Conclusions: Soil/Ground Water: The release potential to soil/ground water is low due to the indoor location of the unit on a concrete floor.

7. UNIT NAME: Former Waste Dimethyl Sulfoxide Tank - (Cont'd.)

Conclusions: Surface Water: There is no release potential to surface water due to the indoor location of the unit on a concrete floor and the distance to the nearest surface water body.

Air: The release potential to air is low due to the closed nature and indoor location of this unit.

Subsurface Gas: There is no potential for generation of subsurface gas due to location of this unit on a concrete floor.

8. UNIT NAME: Municipal Waste Dumpster
(Photograph Number 8)

Unit Description: This outdoor unit is an approximately six-cubic-yard steel dumpster located northeast of the shipping and receiving door at the north end of the Services Area of Building No. 1. It is used for storage of municipal wastes such as paper, cardboard, cleaned empty plastic and glass laboratory containers, and typical office wastes (Reference 31). It is covered and located above an asphalt pad. During the VSI, no evidence of release was identified (Reference 31).

Date of Start-up: This unit began operating in mid-1989 (Reference 31).

Date of Closure: This unit is currently in operation (Reference 31).

Wastes Managed: This unit manages municipal wastes such as paper, cardboard, and typical office wastes. According to the facility representatives, approximately 1,920 cubic yards of these municipal wastes are generated per year (Reference 32).

Release Controls: This unit is covered and located on an asphalt pad (Reference 31).

History of Releases: No evidence of past release was identified during the VSI or through review of the available file material.

Conclusions: Soil/Ground Water: The release potential to soil/ground water is low due to the location above an asphalt pad, enclosed nature of the unit, and solid inert nature of wastes managed.

Surface Water: The release potential to surface water is low due to the solid inert nature of wastes managed and distance to the nearest surface water body.

8. UNIT NAME: Municipal Waste Dumpster - (Cont'd.)

Conclusions: Air: The release potential to air is low due to the enclosed nature of the unit and nonvolatile nature of wastes managed.

Subsurface Gas: There is no potential for generation of subsurface gas due to the above-ground location and enclosed nature of the unit.

9. UNIT NAME: Scrap Metal Dumpster
(Photograph Numbers 9.1 and 9.2)

Unit Description: This outdoor unit is an approximately 20-cubic-yard steel dumpster located north of Building No. 3 (Auxiliary Lab). It is used for storage of scrap metal primarily generated in the Pilot Plant and laboratories, prior to removal for salvaging off-site. It is uncovered and located above a concrete pad. During the VSI, this unit was observed to be rusted, dented, and corroded. Evidence of leakage of a dark oily liquid was observed on the concrete beneath this unit and on adjacent soils, during the VSI (Reference 31).

Date of Start-up: This unit began operating in 1976 (Reference 33).

Date of Closure: This unit is currently in operation (Reference 31).

Wastes Managed: This unit manages scrap metal generated at the facility which would include old equipment from the Pilot Plant and laboratories, old building steel from renovations, and miscellaneous scrap metal. Approximately 1,240 cubic yards of scrap metal are generated per year (Reference 32).

Release Controls: No release controls were identified for this unit during the VSI and through review of the available file material.

History of Releases: During the VSI, evidence of leakage of a dark oily liquid was observed on the concrete beneath this unit and on adjacent soils (Reference 31).

Conclusions: Soil/Ground Water: The release potential to soil/ground water is high due to the observed leakage of a dark oily liquid on adjacent soils.

9. UNIT NAME: Scrap Metal Dumpster - (Cont'd.)

Conclusions: Surface Water: The release potential to surface water is low due to the distance to the nearest surface water body.

Air: The release potential to air is low due to the small quantity of potentially volatile waste managed.

Subsurface Gas: The potential for generation of subsurface gas is moderate due to the observed leakage of a dark oily liquid on adjacent soils.

10. UNIT NAME: Carbon Waste Dumpster
(Photograph Number 10)

Unit Description: This outdoor unit is an approximately 50-cubic yard steel dumpster located north of the northeast corner of Building No. 6 (Pilot Plant). It is used for storage of waste non-heat-treated carbon solids, empty fiber drums, and old wooden pallets (Reference 31). According to facility representatives, approximately 850 cubic yards of this waste material is generated per year (Reference 32). The waste is picked up by a contractor and disposed of in a municipal sanitary landfill (Reference 32). This unit is uncovered and located above a concrete pad. During the VSI, rust stains and a white solid material were observed on the concrete pad adjacent to the unit; however, no evidence of release to soil was identified (Reference 31).

Date of Start-up: This unit began operating in 1976 (Reference 33).

Date of Closure: This unit is currently in operation (Reference 31).

Wastes Managed: This unit manages waste non-heat-treated carbon solids, empty fiber drums, and old wooden pallets (References 5 and 31). Approximately 850 cubic yards of this waste material is generated per year (Reference 32).

Release Controls: This unit is enclosed on four sides and located above a concrete pad (Reference 32).

History of Releases: No evidence of past release was identified during the VSI or through review of the available file material.

Conclusions: Soil/Ground Water: The release potential to soil/ground water is low due to the location above a concrete pad, and solid inert nature of wastes managed.

10. UNIT NAME: Carbon Waste Dumpster - (Cont'd.)

Conclusions: Surface Water: The release potential to surface water is low due to the solid inert nature of wastes managed and distance to the nearest surface water body.

Air: The release potential to air is low due to the nonvolatile nature of wastes managed.

Subsurface Gas: There is no potential for generation of subsurface gas due to the above-ground location of the unit.

11. UNIT NAME: Satellite Scrap Graphite Accumulation Areas
(Photograph Numbers 11 and 12)

Unit Description: This indoor unit includes several 55-gallon steel drums primarily located in the machining area of Building No. 6 (Pilot Plant). The drums are used in areas where small quantities of scrap graphite are generated at a particular time and are periodically moved to new locations (Reference 32). Scrap graphite is either recycled by Union Carbide or sold for recycling off-site (Reference 32). According to facility representatives, approximately 60,000 pounds of scrap graphite is generated per year (Reference 33). During the VSI, no evidence of release was observed (Reference 31).

Date of Start-up: This unit began operating in approximately 1965 (Reference 32).

Date of Closure: This unit is currently in operation (Reference 31).

Wastes Managed: This unit manages scrap graphite. According to facility representatives, approximately 60,000 pounds of scrap graphite is generated per year (Reference 31).

Release Controls: This unit is located indoors on a concrete floor (Reference 31).

History of Releases: No evidence of past release was identified during the VSI or through review of the available file material.

Conclusions: Soil/Ground Water: The release potential to soil/ground water is low due to the indoor location of the unit on a concrete floor.

Surface Water: There is no release potential to surface water due to the indoor location of the unit on a concrete floor and the distance to the nearest surface water body.

11. UNIT NAME: Satellite Scrap Graphite Accumulation Areas -
(Cont'd.)

Conclusions: Air: The release potential to air is low due to the nonvolatile nature of waste managed.

Subsurface Gas: There is no potential for generation of subsurface gas due to location of this unit on a concrete floor.

12. UNIT NAME: Satellite Scrap Carbon Dumpster
(Photograph Numbers 11 and 12)

Unit Description: This indoor unit is a mobile steel dumpster located primarily in the machining area of Building No. 6 (Pilot Plant). The two-cubic-yard dumpster is periodically moved to points of scrap carbon generation (Reference 32). The scrap carbon is placed in the Carbon Waste Dumpster (SWMU 10) prior to pick up by a contractor and disposal in a municipal sanitary landfill (Reference 32). During the VSI, no evidence of release was observed at this unit (Reference 31).

Date of Start-up: This unit, or a similar unit, began operating in approximately 1965 (Reference 32).

Date of Closure: This unit is currently in operation (Reference 31).

Wastes Managed: This unit manages scrap carbon. According to facility representatives, approximately 850 cubic yards of waste carbon is generated per year (Reference 32).

Release Controls: This unit is located indoors on a concrete floor (Reference 31).

History of Releases: No evidence of past release was identified during the VSI or through review of the available file material.

Conclusions: Soil/Ground Water: The release potential to soil/ground water is low due to the indoor location of the unit on a concrete floor.

12. UNIT NAME: Satellite Scrap Carbon Dumpster - (Cont'd.)

Conclusions: Surface Water: There is no release potential to surface water due to the indoor location of the unit on a concrete floor and the distance to the nearest surface water body.

Air: The release potential to air is low due to the nonvolatile nature of wastes managed.

Subsurface Gas: There is no potential for generation of subsurface gas due to location of this unit on a concrete floor.

13. UNIT NAME: Laboratory Chemical Disposal Piping
(Photograph Number 13)

Unit Description: This indoor unit consists of the system of cast iron piping used to transfer dilute laboratory chemicals from sinks to the municipal sewer line. The piping is located in Building No. 1 in the service corridors between laboratories and leads to the municipal sewer line at locations within Building No. 1 (References 31 and 32). During the VSI, above-ground portions of this unit were observed to be in good condition (Reference 31).

Date of Start-up: This unit began operating in approximately 1956 (Reference 24).

Date of Closure: This unit is currently in operation (Reference 31).

Wastes Managed: This unit manages dilute laboratory chemicals including the inorganic precipitates which are presented in Table IV-3 (Reference 5).

Release Controls: This unit is located indoors.

History of Releases: No evidence of past release was identified during the VSI or through review of the available file material.

Conclusions: Soil/Ground Water: The release potential to soil/ground water is low due to the indoor location of the unit.

Surface Water: There is no release potential to surface water due to the indoor location of the unit and the distance to the nearest surface water body.

Table IV-3

Inorganic Chemicals which may be Disposed in Drain
 Identified in the January 1989 Part B Permit Application
 (Adapted from Reference 5)

| <u>Cation</u> | <u>Precipitate</u> | <u>Anion</u> | <u>Drain Disposal</u> |
|---------------|--------------------|------------------------|--|
| Aluminum | OH- | Bisulfate | Soluble in water; rinse with at least 100 parts of water per part of chemical. |
| Ammonium | -- | Borate | |
| Calcium | OH- | Bromide | |
| Copper | OH- | Carbonate | |
| Iron | OH- | Chloride | |
| Magnesium | OH- | Cyanate | |
| Molybdenum | Calcium Tungstate | Hydroxide | |
| Potassium | -- | Iodide | |
| Sodium | -- | Oxide | |
| Titanium | OH- | Phosphate | |
| Zinc | OH- | Sulfate | |
| Zirconium | OH- | Sulfite Thiocyanate | |

13. UNIT NAME: Laboratory Chemical Disposal Piping - (Cont'd.)

Conclusions: Air: The release potential to air is low due to the enclosed nature and indoor location of this unit.

Subsurface Gas: There is no potential for generation of subsurface gas due to the enclosed nature and indoor location of this unit.

14. UNIT NAME: Raw Material Dispensing Room Leak Collection
Cans
(Photograph Number 14)

Unit Description: This indoor unit consists of several approximately one-half gallon steel cans located beneath spigots of raw material drums in Room 10B (Raw Material Dispensing Room) at the north end of the Services Area of Building No. 1.

Date of Start-up: This unit began operating in the late-1950s to early-1960s (References 24 and 32).

Date of Closure: This unit is currently in operation (Reference 31).

Wastes Managed: This unit manages small quantities of raw materials such as methanol, toluene, acetone, trichloroethylene, acetonitrile, dimethyl sulfoxide, ethylene dichloride, diesel fuel oil, and hydraulic oil (Reference 31).

Release Controls: This unit is located in a building on a concrete floor (Reference 31).

History of Releases: No evidence of past release was identified during the VSI or through review of the available file material.

Conclusions: Soil/Ground Water: The release potential to soil/ground water is low due to the indoor location of the unit on a concrete floor.

Surface Water: There is no release potential to surface water due to the indoor location of the unit on a concrete floor and the distance to the nearest surface water body.

14. UNIT NAME: Raw Material Dispensing Room Leak Collection
Cans - (Cont'd.)

Conclusions: Air: The release potential to air is low due to the small quantity of waste managed at this unit.

Subsurface Gas: There is no potential for generation of subsurface gas due to location of this unit on a concrete floor.

15. UNIT NAME: Raw Material Dispensing Room Floor Drains
(Photograph Numbers 15.1 and 15.2)

Unit Description: This indoor unit consists of two approximately four-foot-long by six-inch-wide by four-inch-deep in-ground concrete floor drains and associated piping located at two doorways of Room 10B (Raw Material Dispensing Room) at the north end of the Services Area of Building No. 1. The steel grate-covered drains are designed to collect and contain spills in the room. During the VSI, evidence of a solidified spilled material was observed in one of the drains and minor stains were observed on the concrete floor (Reference 31).

Date of Start-up: This unit was constructed in approximately 1956 (Reference 24).

Date of Closure: This unit is currently in operation (Reference 31).

Wastes Managed: This unit is designed to manage spills or leaks of raw materials such as methanol, toluene, acetone, trichloroethylene, acetonitrile, dimethyl sulfoxide, ethylene dichloride, diesel fuel oil, and hydraulic oil (Reference 31).

Release Controls: This unit is designed to control releases from containers of raw materials in Room 10B (Raw Material Dispensing Room). Although not confirmed on facility drawings, the facility representative believes that these drains are connected to the sanitary sewer lines (Reference 32).

History of Releases: During the VSI, evidence of a solidified spilled material was observed in one of the drains (Reference 31).

15. UNIT NAME: Raw Material Dispensing Room Floor Drains -
(Cont'd.)

Conclusions: Soil/Ground Water: The release potential to soil/ground water is based on the integrity of the unit which could not be determined due to the in-ground and below-ground location of this unit.

Surface Water: There is no release potential to surface water based on the distance to the nearest surface water body.

Air: The release potential to air is low due to small quantity of waste managed and the indoor location of the unit.

Subsurface Gas: The potential for generation of subsurface gas is based on the integrity of the unit which could not be determined due to the in-ground and below-ground location of the unit.

V. SUMMARY OF SUGGESTED FURTHER ACTIONS

| Unit No. | Unit Name | Operational Dates | Suggested Further Action | Evidence Releases (Yes/No) |
|----------|---|-------------------------------------|--|----------------------------|
| 1 | Hazardous Waste Container Storage Area No. 1 | 1980 to present | Continue implementation of approved Closure Plan. | Yes |
| 2 | Hazardous Waste Container Storage Area No. 2 | 1980 to present | No further action is suggested for this unit at this time. | No |
| 3 | Hazardous Waste Container Storage Area No. 3 | 1980 to present | Continue implementation of approved Closure Plan. | No |
| 4. | Former Hazardous Waste Drum Storage Area | 1956 to 1980 | No further action is suggested for this unit at this time. | No |
| 5. | Former Chemical Reacting Site | Approximately 1960s to mid-1970s | Conduct a Sampling Visit to determine if hazardous constituents are present in soils and to assess the potential for downward migration. | Yes |
| 6. | Waste Dimethyl Sulfoxide Drum | 1985 to present | No further action is suggested for this unit at this time. | No |
| 7. | Former Waste Dimethyl Sulfoxide Tank | 1982 to 1985 | No further action is suggested for this unit at this time. | No |
| 8. | Municipal Waste Dumpster | 1989 to present | No further action is suggested for this unit at this time. | No |
| 9. | Scrap Metal Dumpster | 1976 to present | Conduct a Sampling Visit to determine if hazardous constituents are present in soils and to assess the potential for downward migration. | Yes |
| 10. | Carbon Waste Dumpster | 1976 to present | No further action is suggested for this unit at this time. | No |
| 11. | Satellite Scrap Graphite Accumulation Areas | Approximately 1965 to present | No further action is suggested for this unit at this time. | No |
| 12. | Satellite Scrap Carbon Dumpster | Approximately 1965 to present | No further action is suggested for this unit at this time. | No |
| 13. | Laboratory Chemical Disposal Piping | Approximately 1956 to present | No further action is suggested for this unit at this time. | No |
| 14. | Raw Material Dispensing Room Leak Collection Cans | Approximately late-1950s to present | No further action is suggested for this unit at this time. | No |
| 15. | Raw Material Dispensing Room Floor Drains | Approximately 1956 to present | Determine and document the integrity of the in-ground and below-ground unit. In addition, verify that these drains connect to the sanitary sewer line. Consider blocking connection to prevent possible releases (due to leaks or spills in the Raw Material Dispensing Room) to sanitary sewer. | No |

VI. REFERENCES

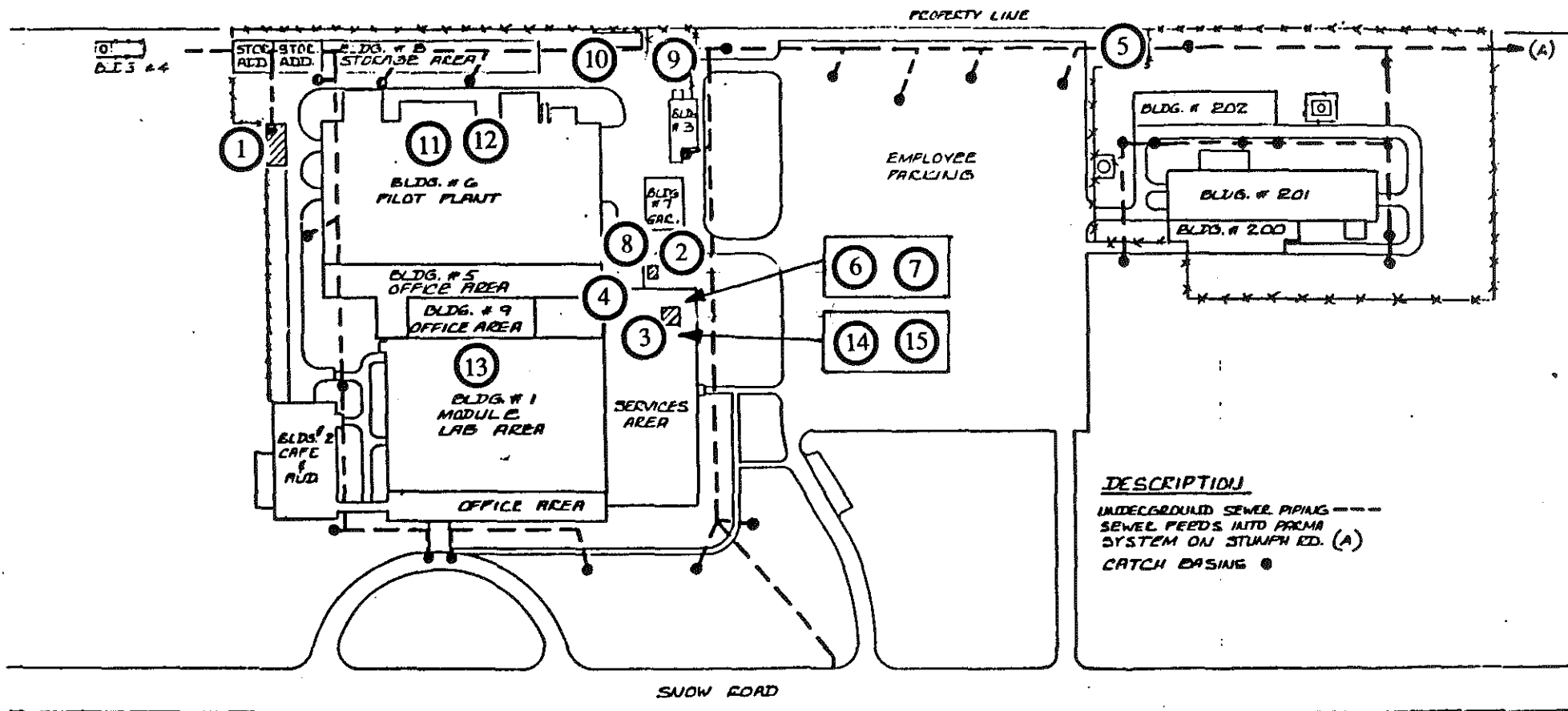
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2. Notification of Hazardous Waste Activity, Form 8700-12, Received August 22, 1980.
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4. Letter from D.A. Mieskowski, UCAR Carbon Company, Inc., to Lisa Pierard, U.S. EPA, March 3, 1989. Enclosure: Closure Plan for Container Storage Areas, March 1989, UCAR Carbon Chemical Company, Inc., Parma Technical Center.
5. RCRA Part B Permit Submission, Revised January 27, 1989, Union Carbide Corp., UCAR Chemical Company, Inc., Parma Technical Center.
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8. Letter from D.A. Mieskowski, UCAR Carbon Company, Inc., to T. Crepeau, Ohio EPA, re: Permit Change Request, no attachment, November 17, 1988.
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14. Facility Annual Hazardous Waste Report, March 8, 1983.
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17. Letter from D.A. Mieskowski, Union Carbide Corp., to D.J. Berg, Ohio EPA, re: Response to compliance letter from Berg, March 6, 1986.
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20. Phone conversation record between C. McCord, Ohio EPA, and Z. Clayton, Ohio EPA-ER, June 11, 1984.
21. RCRA Interim Status Inspection Form, date not readable.
22. Letter from E. Betonte, Union Carbide Corp., to Ohio EPA, April 28, 1982, Attachment: Part B of the Ohio EPA Annual Report, dated April 27, 1982.
23. List of Air Permitted Sources of Union Carbide from the Division of Air Pollution Control, Ohio Department of Public Health and Welfare files.
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28. Letter from G. Wilk, Samsel Services Company, to D. Mieskowski, Union Carbide Corporation, re: Analytical Results, dated December 12, 1988.
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30. Field Log Book #1, dated February 12, 1990.
31. Field Log Book #2, dated February 12, 1990.
32. Telephone Log of Conversation between Scott Palmer, A.T. Kearney, and Dave Mieskowski, UCAR, Re: Additional SWMU Information Needs, March 1, 1990.
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45. Telephone Log of Conversation between Scott Palmer (A.T. Kearney) and Representatives of Cuyahoga County Chamber of Commerce, Re: Populations, March 6, 1990.

ATTACHMENT A

Locations of SWMUs at UCAR Carbon Company, Inc.



Scale: One Inch Equals Approximately 150 Feet

ATTACHMENT A:
Locations of SWMUs at UCAR Carbon Company, Inc.
in Parma, Ohio (adapted from Reference 4).

Legend

⑥ = SWMU

ATTACHMENT B

Visual Site Inspection Summary Report

Attachment B

Visual Site Inspection Summary Report

The Visual Site Inspection (VSI) summary and photograph log document the activities and observations of representatives of A.T. Kearney during the February 12, 1990 VSI of the UCAR Carbon Company facility in Parma, Ohio. Observations and findings from the VSI have been incorporated into the main body of this report and provide a basis for suggested further actions.

Visual Site Inspection Summary

The following individuals participated in the VSI:

| | |
|-----------------|-----------------------|
| Grover Buhr | Kearney/Centaur, Inc. |
| Scott Palmer | A.T. Kearney, Inc. |
| Dave Mieskowski | UCAR |
| J.E. Gilmore | UCAR |
| Vicki Vesel | UCAR |
| Don Woods | UCAR |
| Joan Long | UCAR |
| Bill Wumek | UCAR |

The investigation team assembled at 8:30 a.m. at the conference room of the UCAR Carbon facility. Attendees began the introductory meeting with a discussion of the purpose of the VSI, RFA, and the Corrective Active Program of USEPA.

Facility representatives then provided information regarding land use history, operations history, current operations, waste management practices, and specific information regarding SWMUs. According to facility representatives, the facility was dedicated in 1956 and included 70 acres of contiguous property. Initial research included theoretical carbon research for electrochemical, ceramic, and semiconducting materials. The Parma Technical Center was constructed in 1965 and included construction of the Pilot Plant. The Control Line Facility, used for manufacturing of high performance graphite for U.S Navy Missile Guidance Systems, was constructed east of the existing buildings. This facility closed in December 1985. There are currently 370 employees at the UCAR site.

Facility representatives indicated that the closure plan for the RCRA-regulated container storage areas was approved in January 1990. Facility representatives also stated that existing permits at UCAR included a permit to discharge to the municipal sanitary wastewater treatment system and air permits for process equipment.

The introductory meeting ended at approximately 9:20 a.m. The VSI began at 9:30 a.m. and included observations of SWMUs and related process areas. Photographs were taken by Scott Palmer using a 35 mm camera and Kodak 400 ASA color print film.

Visual inspection was completed at approximately 12:00 p.m. A closing meeting was held in the conference room at 12:15 p.m. to clarify findings and fill in data gaps in the record. The VSI was completed at approximately 12:30 p.m.

ATTACHMENT C

Photograph Log

The photographs on the following pages document the observations made during the VSI. The photographs are identified by a number which corresponds to an appropriate SWMU identifier. In instances where several photographs are provided for one unit, a decimal and sequential number will be used to denote the photograph sequence (i.e., 1.1, 1.2, and 1.3 denote photographs associated with SWMU No. 1).



- 1.1 Hazardous Waste Container Storage Area No. 1. View looking south of the location of this outdoor unit. According to the facility representative, hazardous waste containers were formerly stored at the location of the salvagable equipment in the foreground.



- 1.2 Hazardous Waste Container Storage Area No. 1. View looking southwest of the outdoor unit. The area defined by the white markings is used for storage of hazardous waste. Note the corroded asphalt at this unit.



2. Hazardous Waste Container Storage Area No. 2. View looking east of this steel shed. Note minor staining on walls and floor of unit.



3. Hazardous Waste Container Storage Area No. 3. View looking east of this concrete-paved unit.

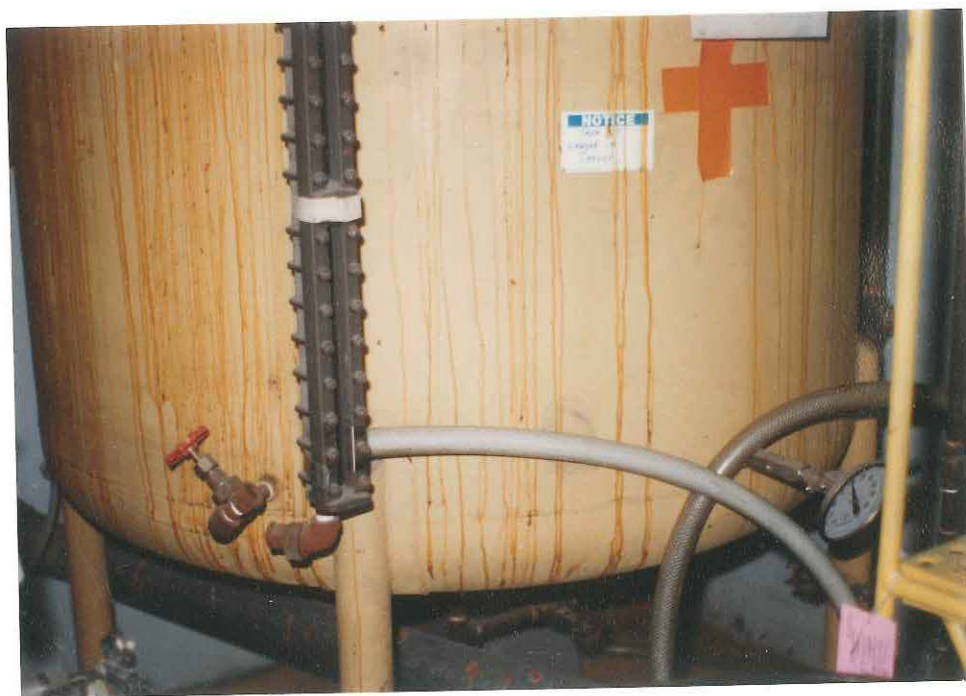


4. Former Hazardous Waste Drum Storage Area. View looking northwest of the location of this former drum storage area for waste solvents and oils. According to the facility representative, wastes are no longer stored at this location.



5. Former Chemical Reacting Site. View looking southeast of this outdoor unit. Note the rectangular-shaped area of stressed vegetation at the center of the photograph.

- 6.0 Waste Dimethyl Sulfoxide Drum. No photograph was available for this unit.



7. Former Waste Dimethyl Sulfoxide Tank. View looking west of this inactive steel tank. Note the evidence of drippage on the side of this diked above-ground tank.



8. Municipal Waste Dumpster. View looking southwest of this steel unit used for storage of solid inert municipal wastes. According to the facility representative, this unit is emptied daily.



- 9.1 Scrap Metal Dumpster. View looking northeast of this 20-cubic-yard steel unit shown in the right portion of photograph. Note the leakage of a dark oily liquid beneath the dumpster.



9.2 Scrap Metal Dumpster. Close-up view of dark oily stains originating from the Scrap Metal Dumpster and leading to adjacent soils shown in background of photograph.



10. Carbon Waste Dumpster. View looking west of the approximately 50-cubic-yard steel unit. Scrap carbon generated in the Pilot Plant is placed in this unit, prior to transport to a municipal sanitary landfill.



11. Satellite Scrap Graphite Accumulation Areas (SWMU 11) and
 & Satellite Scrap Carbon Dumpster (SWMU 12). Close-up view
 12. of a representative example of SWMU 11 (in the foreground)
 and SWMU 12 (in the rear of the photograph). Note the good
 condition of the concrete floor beneath these units.



13. Laboratory Chemical Disposal Piping. View looking east
 through a service corridor between laboratories in Building
 No. 1. Note the location of piping above the concrete
 floor at this location.



14. Raw Material Dispensing Room Leak Collection Cans.
Close-up view of these approximately one-half gallon steel containers. Note the location on a concrete floor beneath spigots of raw material drums.



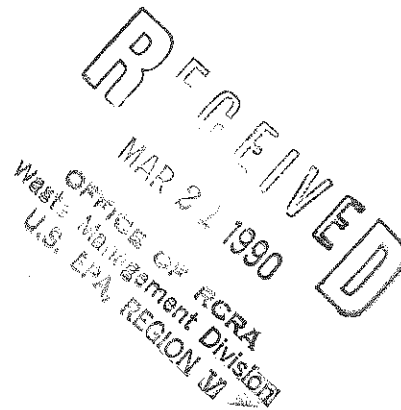
- 15.1 Raw Material Dispensing Room Floor Drains. View looking west of the in-ground steel grate-covered floor drains at the entrance door to Room 10B.



15.2 Raw Material Dispensing Room Floor Drains. View looking east of the in-ground steel grate-covered floor drain in the foreground at the entrance to the rear section of Room 10B.

A.T. Kearney, Inc.
222 South Riverside Plaza
Chicago, Illinois 60606
312 648 0111
Facsimile 312 648 1939-2302

Management
Consultants



ATKEARNEY

March 20, 1990

Mr. Bernie Orenstein
Regional Project Officer
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, IL 60604

Reference: EPA Contract No. 68-W9-0040; Work Assignment
No. R05-05-07; UCAR Carbon Company, Inc.,
Parma, Ohio; EPA ID No. OHD003926748; Final
Deliverable

Dear Mr. Orenstein:

Enclosed please find the Preliminary Review/Visual Site Inspection (PR/VSI) Report for the UCAR Carbon Company facility in Parma, Ohio. A total of 15 Solid Waste Management Units (SWMUs) were present at the facility. Based on our review of the SWMUs and the facility's waste-handling practices, eleven of the SWMUs have low or no potential for the release of hazardous wastes or constituents to the environment. No further action is suggested for these units.

Two SWMUs are considered to have a high potential for the release of hazardous wastes or constituents to the subsurface. These include the Former Chemical Reacting Site (SWMU 5) and the Scrap Metal Dumpster (SWMU 9). A RCRA Sampling Visit (SV) is suggested for each of these units.

The RCRA-regulated Hazardous Waste Storage Area No. 1 (SWMU 1) has a moderate potential for the release of hazardous wastes or constituents to the subsurface. Continued monitoring and implementation of the approved RCRA Closure Plan is suggested.

Mr. Bernie Orenstein
March 20, 1990
Page 2

The integrity of the Raw Material Dispensing Room Drains (SWMU 15) could not be determined during the VSI due to the in-ground and below-ground location of the unit. In addition, facility representatives could not provide documented confirmation regarding the destination of the drains, but assume that the drains connect to the sanitary sewer lines. Determination and documentation of the integrity of the unit is suggested. In addition, verification of the drainage destination is suggested.

Should you have any questions regarding this deliverable, please feel free to contact me at (312) 993-8814.

Sincerely,



Ann L. Anderson
Technical Director

Enclosure

| | |
|-------------------------------|----------------------|
| cc: F. Norling, EPA, Region V | G. Buhr |
| G. Taylor, OEPA | L. Poe |
| A. Williams (w/o encl.) | P. Martz (w/o encl.) |
| A. Glazer | B. Morson, SAIC |

3820E

MAY 16 1990

5HR-13

D.A. Mieskowski, Manager
Health, Safety and Environmental Protection
UCAR Carbon Company, Inc.
P.O. Box 6116
Cleveland, Ohio 44101

RE: UCAR Carbon Company, Inc.
Parma, Ohio
OHD 003 926 748

Dear Mr. Mieskowski:

As you requested by telephone, I have enclosed a copy of the Preliminary Review/Visual Site Inspection (PR/VSI) Report for the UCAR Carbon Company facility in Parma, Ohio. This report was prepared by A.T. Kearney, under contract to the U.S. EPA.

The PR/VSI report determined that three of the observed Solid Waste Management Units (SWMUs) require further action, in addition to the units that are covered by the RCRA closure plan.

The area called Solid Waste Management Unit #5 (formerly Chemical Reacting Site) was determined to have a high potential for releases of hazardous constituents to the environment, based upon reports of former waste management practices and observation of stressed vegetation at the unit during the VSI. Therefore, it is recommended that soils in this area be sampled to determine if hazardous constituents are present in soils and to assess the potential for downward migration of constituents. In addition, SWMU #9 (Scrap Metal Dumpster) was determined to have a high potential for releases, based upon observations of oil-stained soils at the unit during the VSI. It is recommended that soil samples be taken at this area to determine if hazardous constituents are present and to assess the potential for downward migration. The unit was also observed to be in poor condition at the time of the VSI. It is recommended that this unit be repaired or replaced to prevent additional releases of oily liquids.

The potential for releases from SWMU #19 (Raw Material Dispensing Room Floor Drains) could not be determined, as the unit is below ground, and no file information exists on the destination or integrity of the drains. Therefore, it is recommended that this information should be determined, and that any observed problems should be corrected.

Thank you for your cooperation with our contractor personnel during the VSI. If you have any questions, please contact me at, (312) 886-6198.

Francine P. Norling
Environmental Scientist

5HR-13:NORLING:bd:05/08/90:6-6198

UCAR.ltr

| RCRA PERMITS | TYP. | AUTH. | IL CHIEF | IN. CHIEF | MI. CHIEF | MN/WI CHIEF | OH. CHIEF | RPB CHIEF | O.R. A.D.D. | WMD DIR |
|-----------------|---------------|----------------|-------------|--------------|--------------|----------------|--------------|--------------|----------------|------------|
| INIT. DATE | me 5/14/90 | JAN 5/14/90 | | | | | | | | |

RCRA FACILITY ASSESSMENT

Report for UCAR Carbon Company, Inc.

Parma, Ohio
OHD 003 926 748

Facility Description

UCAR Carbon Company, Parma, Ohio is a 62 acre research and development facility which investigates all phases of carbonization and graphitization processes.

I. Preliminary Review (PR)

The PR was conducted by A.T. Kearney, Inc. (U.S. EPA Contractors) in early February 1990. During the PR, 9 Solid Waste Management Units (SWMUs) and 5 areas of concern were identified. See Appendix I for a list of those SWMUs.

II. Visual Site Inspection.

The VSI was conducted by A.T. Kearney, Inc., on February 12, 1990. During the VSI two previously identified SWMUs (Sump #1 and # 2) were found not to exist at the facility, and the five areas of concern previously identified were deleted from further consideration. One SWMU (Underground Sewer Piping) was reclassified as part of two other SWMUs. In addition, nine new SWMUs were identified during the VSI, for a total of fifteen SWMUs. See Appendix I for a list of these SWMUs.

III. Conclusions and Recommendations

SWMU #5, the former Chemical Reacting Site, was determined to have a high potential for releases to the environment, based upon former waste management practices and observation of stressed vegetation at the unit during the VSI. In addition, SWMU #9, (Scrap Metal Dumpster) was determined to have a high potential for releases, based upon observation of oil-stained soils at the unit during the VSI. The potential for releases from one unit (SWMU # 15, Raw Material Dispensing Room) could not be determined. The unit is below ground, and the facility representatives could not confirm the destination or integrity of the drains. The RCRA-regulated Hazardous Waste Storage Area #1 was determined to have a moderate potential for releases, based on file documentation of past releases and poor integrity of the asphalt pad during the VSI. All other units were determined to have low potential for releases.

Based on these PR/VSI findings, an RFI/CMS could be imposed upon UCAR carbon company. As the facility is no longer seeking an operating permit, an RFI/CMS could only be imposed through a 3008(h) order. An alternative approach would be to inform the facility of the PR/VSI findings and encourage the facility to conduct sampling at SWMU #5 and 9, and to verify the condition of SWMU #15. The RCRA-regulated SWMU #1 should be addressed through implementation of a State-approved RCRA Closure Plan.

A.T. Kearney, Inc.
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Management
Consultants

February 2, 1990

RECEIVED
FEB 5 - 1990
OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

Mr. Bernie Orenstein
Regional Project Officer
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

Reference: EPA Contract No. 68-W9-0040, Work Assignment
No. R05-05-07; UCAR Carbon Co., Inc., Parma,
Ohio; EPA I.D. No. OHD003926748; Preliminary
Review/Visual Site Inspection; Work Plan

Dear Mr. Orenstein:

Enclosed please find the proposed work plan which you requested for the above-referenced work assignment. This work plan calls for the Kearney Team to conduct a Preliminary Review/Visual Site Inspection and prepare a PR/VSI report evaluating the potential for release from each solid waste management unit (SWMU) and area of concern (AOC) for the UCAR facility in Parma, Ohio.

All applicable A.T. Kearney conflict of interest avoidance procedures have been adhered to for the proposed firms and staffs.

Also enclosed is a work plan approval sheet which you should sign and return to Allen Pearce. In accordance with the procedures for this contract, if the Contracting Officer has not provided written approval of this work plan by March 3, 1990, A.T. Kearney will stop work on this project. In these cases, A.T. Kearney will not resume work until the Contracting Officer approves the work plan.

Based on a discussion between Ms. Lisa Pierard (EPA, Ohio Section Chief) and Ms. Ann Anderson, certain agreements were made with respect to this work plan due to the short turnaround time required by EPA to complete the work assignment.

The agreements are summarized below:

- The Kearney Team will conduct a PR, but will not submit a PR Report.
- The Kearney Team will contact the facility as soon as possible to schedule the VSI. The VSI Notification Letter will be submitted to EPA as quickly as possible for signature and distribution. The letter will not include the VSI Agenda and Preliminary Information Needs documents which are typically submitted as enclosures. Because the aforementioned documents will take additional time to develop, they will be sent under separate cover directly to the facility by February 9, 1990, with concurrent copies sent to EPA and the appropriate Kearney Team members.
- Should the Kearney Team find a large number of SWMUs during the VSI, they may present SWMUs with a low release potential as a table which will provide the SWMU name and number, dates of operation, remarks describing why there is a low release potential to all media, and the relevant photographs.

In order to determine the need for a site health and safety plan, or to prepare such a plan, the Kearney Team may need to obtain additional information from EPA or the facility personnel regarding the potential hazards at this site. If information is not provided to the level of detail required to properly assess potential hazards, A.T. Kearney reserves the right to delay proceeding with the site visit until the information is provided.

In cases where the Kearney Team must delay a site visit due to circumstances outside the Team's control, A.T. Kearney will accommodate the schedule change to the maximum extent possible. However, A.T. Kearney reserves the right to charge EPA for expenses incurred as a direct result of the delay. Any such expenses will be brought to EPA's attention as quickly as possible and will be properly documented.

Mr. Bernie Orenstein
February 2, 1990
Page Three

Please feel free to call me or Grover Buhr, the Kearney Team Work Assignment Manager (who can be reached at 415/598-9390), if you have any questions.

Sincerely,



Ann L. Anderson
Technical Director

cc: A. Pearce, EPA OSW
C. Chase, EPA Contracts
F. Norling, EPA Region V
A. Glazer
P. Martz
L. Poe
G. Buhr
S. Palmer
P. Davol
L. Sherman
J. Atchue
M. Greenwood
P. Williams
A. Williams
M. Ritter
L. Lai, SAIC

3701E

PROPOSED WORK PLAN

UCAR CARBON CO., INC.
PARMA, OHIO
PRELIMINARY REVIEW/VISUAL SITE INSPECTION
EPA I.D. NO. OHD003926748

Submitted by:

A.T. Kearney, Inc.
222 South Riverside Plaza
Chicago, IL 60606

Submitted to:

Mr. Bernie Orenstein
U.S. Environmental Protection Agency
Region V
230 South Dearborn Street
Chicago, Illinois 60604

In response to:

EPA Contract No. 68-W9-0040
Work Assignment No. R05-05-07

February 2, 1990

EPA Contract No. 68-W9-0040
Work Assignment No. R05-05-07
UCAR Carbon Company, Inc.
Parma, Ohio
PR/VSI Report
EPA I.D. No. OHD003926748

Work Plan Revision No. 0
February 2, 1990

Regional Work Plan Approval

I have reviewed the attached work plan and find it meets our criteria for technical accuracy and properly reflects the scope of work and intended use of the deliverable(s) as described in the work assignment. The projected cost, staff hour estimates, and labor mix are also acceptable.

APPROVAL:

EPA Regional Project Officer

Date

APPROVAL:

EPA Headquarters Project Officer

Date

APPROVAL:

EPA Contracting Officer

Date

CONCURRENCE:

A.T. Kearney Program Director

Date

EPA Contract No. 68-W9-0040
Work Assignment No. R05-05-07
UCAR Carbon Company, Inc.
Parma, Ohio
PR/VSI Report
EPA I.D. No. OHD003926748

Work Plan Revision No. 0
February 2, 1990

UCAR CARBON CO., INC.
PRELIMINARY REVIEW/VISUAL SITE INSPECTION

WORK TO BE PERFORMED

The Kearney Team will perform a file search of State of Ohio files, conduct a Visual Site Inspection (VSI), and prepare a PR/VSI report evaluating the potential for release from each solid waste management unit (SWMU) and area of concern (AOC) identified during the VSI. In addition, the Kearney Team will provide suggested further actions for each SWMU and AOC.

The UCAR Carbon Company in Parma, Ohio, is a research and development facility which investigates all phases of carbon processes. The facility consists of several laboratory buildings, a pilot plant, a small specialty graphite manufacturing operation, and three hazardous waste container storage areas. The site is 790 feet wide (north-south direction) and 1,780 feet long (east-west direction).

The facility is currently seeking to close the container storage areas (which have a total storage capacity of 4,000 gallons). The Ohio EPA disapproved the March 7, 1989 closure plan submittal, and required submittal of a modified closure plan addressing specific deficiencies.

Preliminary review of the files indicate that there are approximately nine SWMUs and five AOCs to be inspected at the site.

PRIMARY INTENDED USE

The purpose of this work assignment is to assist EPA Region V in:

- (1) Identifying and gathering information on releases at the facility.
- (2) Evaluating SWMUs and AOC for release potential to all media, and evaluating regulated units, subject to Subpart F requirements, for release potential to media other than ground water.

- 2 -

- (3) Making preliminary determinations regarding releases of concern and the need for further actions, including a Sampling Visit, RCRA Facility Investigation, and/or interim measures at the facility.
- (4) Screening from further investigations those SWMUs and AOC that do not present a release potential.

The final PR/VSI Report will be suitable for use by EPA in the administrative record for the UCAR Carbon Co., Inc.

PROJECTS AND TASKS

The project will consist of the following tasks:

Task 01 - Prepare a work plan. This will include all preliminary contacts, including the EPA Work Assignment Manager (EPA WAM) and state representative, required for the preparation of the work plan, and file searches at the Ohio EPA and EPA Region V offices.

Task 02 - Conduct a preliminary review of files. Specific information to be reviewed includes RCRA, NPDES, CERCLA, and Air Quality, as well as any Solid Waste files and emergency response or spill notifications.

This task will also include the preparation of a Notification Letter (prepared by A.T. Kearney and submitted to EPA on EPA letterhead). The Additional Information Needs and the Proposed VSI Agenda will be sent directly to the facility under separate cover.

At the request of the EPA WAM, the Kearney Work Assignment Manager (KWAM) will contact the facility to schedule the Visual Site Inspection (VSI). Prior to the VSI, the Kearney Team will discuss the objectives and agenda of the VSI with the EPA WAM.

To prepare for the VSI, the Kearney Team will complete a Health and Safety Checklist to identify the activities and potential hazards at the site. The Health and Safety Checklist will be reviewed for approval by the Kearney Health and Safety Director, who will determine if the checklist is adequate or a site-specific Health and Safety Plan is necessary.

- 3 -

Task 03 - Prepare for and conduct the VSI.

Preparation of field equipment to be used during the VSI is also included in this task.

The objectives of the VSI will include the following:

- Verifying the information collected during the preliminary review, including the location and condition of the SWMUs and AOC;
- Identifying any additional SWMUs and AOC;
- Visually inspecting and obtaining factual information to properly characterize all SWMUs and AOC; documenting field observations with photographs and field logs;
- Reviewing site information with the facility representative and collecting additional information to be used in determining the need for further actions; and
- Identifying possible future sampling locations as appropriate.

Task 04 - Prepare a PR/VSI Report according to the format presented in the Region V RFA - Related Scope of Work for Contract No. 68-W9-0040. In cases where information on SWMUs or AOC can be combined, tables will be developed instead of individual SWMU or AOC summaries. In addition, a brief cover letter will accompany the PR/VSI Report, highlighting major findings. Based upon discussion with EPA WAM, conclusions for SWMUs with low release potential to all media, will be included in a list or table with a brief introductory discussion.

- 4 -

Task 98 - Perform a quality control review of the draft deliverables.

Task 99 - Provide management oversight for the project.

HEALTH AND SAFETY PLAN

In preparing for the site visit, the Kearney Team will complete a site-specific checklist to identify the activities and potential hazards at the site. Information to complete the checklist will be obtained from the Regional Project Officer, EPA WAM and/or EPA staff who are knowledgeable about the site, and from the facility contact.

After the checklist has been completed, a determination will be made regarding the need for a health and safety plan for the site visit based on the anticipated hazards at the site. In cases where a health and safety plan is required, the Kearney Team will develop a specific plan for the site and amend the work plan to include an additional task to provide for resources for plan development. In cases where no health and safety plan is required (i.e., minimal hazard potential), the Kearney Team will follow health and safety procedures as outlined in the Kearney Staff Protocol for site visits.

MONTHLY PROGRESS REPORTS

Information regarding the status of this project will be included in the monthly progress reports A.T. Kearney, Inc. provides to EPA. The information will address:

- Work completed to date,
- Difficulties encountered and remedial action taken,
- Anticipated activity during the subsequent reporting period, and
- Sufficiency of authorized dollars and hours to complete the project.

EPA Contract No. 68-W9-0040
Work Assignment No. R05-05-07
UCAR Carbon Company, Inc.
Parma, Ohio
PR/VSI Report
EPA I.D. No. OHD003926748

Work Plan Revision No. 0
February 2, 1990

- 5 -

QUALITY CONTROL PLAN

The Kearney Team Work Assignment Manager will conduct milestone checks on each task. In addition, draft project deliverables will be reviewed by senior technical staff member of Science Applications International Corporation to ensure quality and consistency with EPA regulations and policy.

STAFFING AND MANAGEMENT

Grover Buhr of Kearney/Centaur will serve as the Kearney Team Work Assignment Manager (KWAM).

Individual staff responsibilities are shown in Attachment I. The proposed staffing and task assignments for the project are shown in Attachment II. Hour allocations are shown for each task.

All applicable conflict of interest (COI) avoidance procedures have been adhered to for the proposed firms and staffs.

PERFORMANCE SCHEDULE

The project will be conducted according to the schedule shown in Attachment III.

COST ESTIMATE

The estimated cost for completing this project is included as Attachment IV.

BASIS FOR PERFORMANCE EVALUATION

The measures for evaluation of work assignment performance are described for each of the following performance criteria: technical quality; compliance with schedule; compliance with budget; and management. Measures for each of these criteria are discussed and agreed upon by the RPO and the Kearney Team WAM during the assignment planning process. To the extent possible, clear, quantitative measures should be established.

EPA Contract No. 68-W9-0040
Work Assignment No. R05-05-07
UCAR Carbon Company, Inc.
Parma, Ohio
PR/VSI Report
EPA I.D. No. OHD003926748

Work Plan Revision No. 0
February 2, 1990

ATTACHMENT I

STAFF RESPONSIBILITY CHART

| <u>STAFF</u> | <u>ROLE</u> | <u>AREAS OF RESPONSIBILITY</u> |
|--------------|--|--|
| A. Anderson | Technical Director | Management oversight |
| P. Martz | Regional Liaison | Initiate work, monitor project planning and implementation, and conduct project performance evaluation |
| A. Williams | Technical Assistant to the Technical Director | Administrative support, such as: perform COI checks, assemble and edit work plans, project tracking, general completeness review of deliverables, and distribute documents |
| G. Buhr | Kearney Team Work Assignment Manager/ Technical Staff | Day-to-day management, conduct file review, prepare for and conduct VSI and prepare PR/VSI report |
| S. Palmer | Technical Staff | Conduct preliminary review, prepare for and conduct VSI and prepare PR/VSI report |
| P. Davol | Technical Staff | File searches at the Ohio EPA |
| M. Greenwood | Technical Staff | Conduct Regional file search |
| L. Sherman | Technical Staff | Conduct preliminary review and prepare PR/VSI report |
| P. Williams | Health and Safety Director | Review Health & Safety Checklist |
| J. Atchue | Field Equipment Manager | Preparation of field equipment for VSI |
| B. Morson | Quality Control Reviewer | Senior-level technical review of final deliverable |

EPA Contract No. 68-W9-0040
 Work Assignment No. R05-05-07
 UCAR Carbon Company, Inc.
 Parma, Ohio
 PR/VSI Report
 EPA I.D. No. OHD003926748

Work Plan Revision No. 0
 February 2, 1990

ATTACHMENT II

STAFFING

| STAFF | | | TASK | | | | | | | |
|--------------------------------------|------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|--------------|
| Name | Firm | <u>1/</u> | <u>2/</u> | <u>01</u> | <u>02</u> | <u>03</u> | <u>04</u> | <u>3/</u> | <u>4/</u> | <u>TOTAL</u> |
| | | Labor | Category | | | | | 98 | 99 | |
| <u>Technical Director</u> | | | | | | | | | | |
| A. Anderson | ATK | P4 | | 6 | - | - | - | - | 12 | 18 |
| <u>Work Assign- ment Manager</u> | | | | | | | | | | |
| G. Buhr | K/C | P4 | | 2 | - | - | - | - | 12 | 14 |
| <u>Staffing</u> | | | | | | | | | | |
| S. Palmer | ATK | P2 | | - | 14 | 24 | 40 | - | - | 78 |
| L. Sherman | ATK | T1 | | 6 | 24 | - | 40 | - | - | 70 |
| P. Martz | ATK | P2 | | 2 | - | - | - | - | 2 | 4 |
| M. Greenwood | ATK | P1 | | 2 | - | - | - | - | - | 2 |
| A. Williams | ATK | T2 | | 8 | - | - | - | - | 12 | 20 |
| P. Williams | K/C | P4 | | - | 2 | - | - | - | - | 2 |
| P. Davol | K/C | P4 | | 8 | - | - | - | - | - | 8 |
| G. Buhr | K/C | P4 | | - | 6 | 24 | 30 | - | - | 60 |
| J. Atchue | K/C | P4 | | - | - | 1 | - | - | - | 1 |
| Tech. Support | K/C | | | 4 | - | - | 20 | - | - | 24 |
| <u>Quality Control</u> | | | | | | | | | | |
| B. Morson | SAIC | P4 | | - | - | - | - | 8 | - | 8 |
| Tech. Support | SAIC | | | - | - | - | - | 3 | - | 3 |
| TOTALS | | | | 38 | 46 | 49 | 130 | 11 | 38 | 312 |

1/ ATK = A.T. Kearney, Inc.

K/C = Kearney/Centaur, a Division of A.T. Kearney, Inc.

SAIC = Science Applications International Corporation

2/ Provides Labor Classification for Each Staff Person (e.g., P4, P3)

3/ Task 98 = Quality Control

4/ Task 99 = Project Management

EPA Contract No. 68-W9-0040
Work Assignment No. R05-05-07
UCAR Carbon Company, Inc.
Parma, Ohio
PR/VSI Report
EPA I.D. No. OHD003926748

Work Plan Revision No. 0
February 2, 1990

ATTACHMENT III

SCHEDULE

| <u>Task</u> | <u>Milestone #</u> | <u>Description</u> | <u>Scheduled Date</u> |
|-------------|--------------------|--|-------------------------------------|
| 01 | 01 | Prepare work plan | 02/02/90 |
| 02 | 02 | Submit VSI Additional Information Needs Attachment to EPA | 02/02/90 |
| 02 | 03 | Submit Health and Safety Checklist to ATK Health and Safety Director | 02/05/90 |
| 02 | 04 | Submit Health and Safety comments to KWAM | 02/07/90 |
| 03 | 05 | Conduct VSI | 02/12/90 |
| 04 | 06 | Conduct conference call with EPA to discuss VSI findings | 02/15/90 |
| 98 | 07 | Submit Draft PR/VSI Report to QC | 03/07/90 |
| 04 | 08 | Submit QC comments to KWAM | 03/12/90 |
| 04 | 09 | Submit Final PR/VSI Report to Technical Director | 03/19/90 |
| 04 | 10 | Submit Final PR/VSI Report to EPA | 03/23/90 |
| 99 | 11 | Project management | In accordance with above milestones |

EPA Contract No. 68-W9-0040
 Work Assignment No. R05-05-07
 UCAR Carbon Company, Inc.
 Parma, Ohio
 PR/VSI Report
 EPA I.D. No. OHD003926748

Work Plan Revision No. 0
 February 2, 1990

ATTACHMENT IV-A

TRAVEL TABLE

| <u>Total</u> <u>Trips</u> | <u>Total</u> <u>People</u> | <u>(1)</u> <u>From/To</u> | <u>Total</u> <u>Train/</u> <u>Air Fare</u> | <u>Total</u> <u>Days</u> | <u>(2)</u> <u>Total</u> <u>Hotel</u> | <u>(2)</u> <u>Total</u> <u>Meals</u> | <u>Rental</u> <u>Car</u> | <u>(3)</u> <u>Total</u> <u>Local</u> <u>Travel</u> | <u>(4)</u> <u>Total</u> <u>Cost</u> |
|------------------------------|-------------------------------|------------------------------|--|-----------------------------|--|--|-----------------------------|---|---|
| 1 | 2 | SF-Cleveland | 1800 | 2 | 118 | 136 | 50 | 30 | 2134 |
| 1 | 1 | Wash.-Cleveland | 110 | 1 | 55 | -- | 52 | 10 | 227 |
| TOTAL | | | <u>1910</u> | | <u>173</u> | <u>136</u> | <u>102</u> | <u>40</u> | <u>2361</u> |

NOTES

- (1) All trips are roundtrip unless otherwise specified.
- (2) Estimates for hotel and meals are based on allowable per diem rates for the destination city. The estimates are calculated from the total days (e.g., 2 days in Boston, Hotel - 2 x \$81; Meals - 2 x \$34).
- (3) Local travel includes cab fare, public transportation, mileage, parking and tolls.
- (4) In cases of file searches, Regional meetings, etc., travel costs may be divided among several projects; therefore, only a portion of the costs will be shown for each project.

3701E

EPA Contract No. 68-W9-0040
Work Assignment No. R05-05-07
UCAR Carbon Company, Inc.
Parma, Ohio
PR/VSI Report
EPA I.D. No. OHD003926748

Work Plan Revision No. 0
February 2, 1990

ATTACHMENT IV-B

ESTIMATED COST

| | <u>Hours</u> | <u>Cost</u> |
|---|--------------|-----------------|
| <u>A.T. Kearney, Inc.</u> | | |
| Labor | 301 | \$ 9,400 |
| ATK Travel and Subsistence | | 1,067 |
| K/C Travel and Subsistence | | 1,294 |
| Other Direct Costs | | |
| Supplies (paper, pens, file folders, etc.) | \$205 | |
| Office Support Labor | 136 | |
| Photocopy | 205 | |
| Postage/Delivery | 341 | |
| Telephone/FAX | 271 | |
| Misc. Expense (computer leases, off-site file storage, subcontract administration, etc.) | 205 | |
| Total ODC Costs | | <u>\$ 1,363</u> |
| Subtotal | | \$13,124 |
| <u>Science Application International Corp.</u> | | |
| Labor | 11 | \$ 557 |
| Fee | | 47 |
| Other Direct Costs | | |
| Photocopy | \$ 12 | |
| Postage/Delivery | 28 | |
| Telephone/FAX | 60 | |
| Computer | 17 | |
| Total ODC Costs | | <u>\$ 117</u> |
| Subtotal | | \$ 721 |
| SUBTOTAL | | \$13,845 |

EPA Contract No. 68-W9-0040
Work Assignment No. R05-05-07
UCAR Carbon Company, Inc.
Parma, Ohio
PR/VSI Report
EPA I.D. No. OHD003926748

Work Plan Revision No. 0
February 2, 1990

ATTACHMENT IV-B (Cont'd)

ESTIMATED COST

A.T. Kearney, Inc.

| | | |
|---------------|----|------------|
| Fee - 3% Base | \$ | 415 |
| 3% Award | | <u>415</u> |

| | | |
|----------|----|-----|
| Subtotal | \$ | 830 |
|----------|----|-----|

| | | |
|-----------------------------|------------|-----------------|
| <u>TOTAL ESTIMATED COST</u> | <u>312</u> | <u>\$14,675</u> |
|-----------------------------|------------|-----------------|

AVERAGE LABOR COST
PER HOUR FOR ALL FIRMS \$31.91

WORK PLAN AVERAGE HOURLY RATE \$47.04

3701E

Kearney/Centaur Division
A.T. Kearney, Inc.
Three Lagoon Drive
Redwood City, California 94065
415 598 9390

Management
Consultants

January 31, 1990

ATKEARNEY

Mr. Bernie Orenstein
Regional Project Officer
U.S. Environmental Protection Agency
Region V, 5HR
230 South Dearborn
Chicago, Illinois 60604

Reference: EPA Contract No. 68-W9-0040; Work Assignment
No. R05-05-07; UCAR Carbon Co., Inc., Parma,
Ohio; EPA I.D. No. OHD003926748; Visual Site
Inspection Agenda Deliverable

Dear Mr. Orenstein:

Enclosed please find the Visual Site Inspection (VSI)
Agenda, the Preliminary List of SWMUs and AOCs, and the
Preliminary Information Needs for the UCAR Carbon Co.,
Inc. This information has been sent to the facility
under separate cover. The VSI is scheduled for February
12, 1990.

Should you have any questions or require additional
information, please feel free to contact me.

Sincerely,



Grover Buhr
Work Assignment Manager

Enclosure

cc: F. Norling, EPA Region V
G. Taylor, OEPA
A. Anderson
A. Glazer
L. Poe
S. Palmer
L. Sherman
P. Martz (w/o encl.)
A. Williams (w/o encl.)

0606B-RC

RECEIVED

FEB 2 - 1990

OFFICE OF RCRA
WASTE MANAGEMENT DIVISION
EPA, REGION V

ATTACHMENT I

RCRA FACILITY ASSESSMENT
PROPOSED VISUAL SITE INSPECTION AGENDA

FACILITY: UCAR Carbon Company, Inc.
12900 Snow Road
Parma, Ohio 44101

EPA I.D. NO.: OHD003926748

FACILITY CONTACT: Dave Mieskowski;
Manager - Health, Safety, and
Environmental Protection
(216) 676-2228

DATE OF INSPECTION: February 12, 1990

PERSONNEL: Grover Buhr, Kearney/Centaur
(415) 598-9390
Scott Palmer, A.T. Kearney, Inc.
(415) 595-4300

PURPOSE OF INSPECTION:

The Hazardous and Solid Waste Amendments of 1984 (HSWA) broaden the Scope of the Environmental Protection Agency's (EPA's) authority under the Resource Conservation and Recovery Act (RCRA) by requiring corrective action for releases of hazardous wastes and constituents at facilities that manage hazardous wastes. The RCRA Facility Assessment (RFA) is conducted to evaluate the potential for releases to the environment and the need for corrective action. The corrective action authority extends to all solid waste management units (SWMUs) and other areas of concern (AOCs) which may be potential sources of releases at the facility.

The RFA includes a desk-top preliminary review (PR) of available file information, a visual site inspection (VSI) of the facility, and, if necessary, a sampling visit. Based on the review of available data for this facility, it has been determined that a VSI is necessary. The purpose of the VSI is:

1. To collect all available relevant information on solid waste management practices that have been used on the site;
2. To gain first-hand information regarding the identification, location, construction, configuration, function served, method of operation, and condition of each SWMU and AOC;

ATTACHMENT I (continued)

UCAR Carbon Co., Inc.
12900 Snow Road
Parma, Ohio 44101
Visual Site Inspection
February 12, 1990

3. To confirm, by visual inspection and discussion with facility representatives, information collected during the PR;
4. To survey the site for additional SWMUs and AOCs not identified in the review of file material;
5. To identify potential sample points for possible future sampling activities;
6. To review the site information and collect additional information to address the information needs identified during the PR; and
7. To take photographs of all SWMUs and other AOCs.

INSPECTION ORGANIZATION

EPA's Contractor, A.T. Kearney, will send a two-member field team to perform the VSI. Due to the size of the facility and the tentative number of SWMUs and AOCs identified, a one-day inspection is anticipated. The team will inspect all past and current solid waste and hazardous waste handling, storage, treatment, and disposal areas on site. Outdoor and indoor waste generation, collection, and accumulation areas in laboratory facilities will be inspected as necessary to acquire a complete understanding of waste streams, waste flows, and waste handling procedures. The team will also identify, inspect, and document potential pathways for release of hazardous constituents into the environment. Facility staff will be interviewed to develop a better understanding of past and current waste management practices. Any available environmental monitoring or sampling data for characterization of the soils, ground water, surface water (or runoff), and air quality at the site, will also be reviewed.

The overall rationale of this inspection is to enable the team to trace the waste flow through the entire facility from the points of generation to ultimate disposal. Attachment I presents the VSI agenda which has been prepared based on the preliminary file review. Some adjustments to the proposed agenda may be necessary to accommodate facility staff,

ATTACHMENT I (continued)

UCAR Carbon Co., Inc.
12900 Snow Road
Parma, Ohio 44101
Visual Site Inspection
February 12, 1990

operational constraints, or unforeseen conditions. This proposed schedule will be reviewed during the introductory meeting and adjusted, if necessary, at that time. The VSI field team will make every reasonable effort to conform to the facility's normal hours of operation.

Attachment II presents the list of potential SWMUs and AOCs which was developed based on the preliminary file review. If any units or areas no longer exist, the locations of the former units and areas should be identified by facility representatives during the VSI. Likewise, any other units or areas where solid wastes, both hazardous and nonhazardous, are treated, stored, or disposed (and areas where potentially hazardous materials are stored, handled, and transferred) should be identified by facility representatives during the VSI.

Attachment III presents the List of Additional Information Needs to be discussed in the introductory meeting at the VSI.

ATTACHMENT I (continued)

UCAR Carbon Co., Inc.
12900 Snow Road
Parma, Ohio 44101
Visual Site Inspection
February 12, 1990

INSPECTION SCHEDULE

| <u>Time</u> | <u>Activity</u> |
|-----------------------|---|
| 8:30 a.m. - 9:30 a.m. | Introductory meeting. <ul style="list-style-type: none">-- Provide introductions and clarify objectives of VSI.-- Discuss current site activities and the waste streams and methods of handling associated with each.-- Discuss agenda, safety and health considerations and general plan for visiting all areas.-- Fill in information gaps, including clarification of active and inactive units and status of all units which have locations listed as unknown. Discuss and gather data/information provided in response to the list of additional information needs. |
| 9:30 a.m. - Noon | Begin tour of the facility. <ul style="list-style-type: none">-- Start inspection of SWMUs and AOCs in the west half of the site.-- Tour (briefly) laboratories and associated areas in the west half of the site, focusing on waste generation points. |
| Noon - 1:00 p.m. | Lunch Break |

ATTACHMENT I (continued)

UCAR Carbon Co., Inc.
12900 Snow Road
Parma, Ohio 44101
Visual Site Inspection
February 12, 1990

1:00 p.m. - 4:00 p.m.

Continue tour of the facility.

- Complete inspection of SWMUs and AOCs throughout the site.
- Complete tour of laboratories and associated areas throughout the site.

4:00 p.m. - 5:00 p.m.

Closing meeting with facility representatives.

- Discuss information needs identified during VSI.
- Obtain any additional data or information required/available.

ATTACHMENT II

UCAR Carbon Co., Inc.
12900 Snow Road
Parma, Ohio 44101
Visual Site Inspection
February 12, 1990

PRELIMINARY LIST OF SWMUs and AOCs

SWMUs

1. Hazardous Waste Container Storage Area No. 1*
2. Hazardous Waste Container Storage Area No. 2
3. Hazardous Waste Container Storage Area No. 3
4. Former Waste Chemical Handling Area
5. Solid Waste Dumpster
6. Lab Chemical Disposal Drain
7. Underground Sewer Piping
8. Sump No. 1
9. Sump No. 2

AOCs

- A. Loading/Unloading Areas
- B. Underground Fuel Oil Storage Tanks (4)
- C. Underground Gasoline Storage Tank
- D. PCB Transformers (3)
- E. PCB Capacitor

* RCRA-regulated.

ATTACHMENT III

UCAR Carbon Co., Inc.
12900 Snow Road
Parma, Ohio 44101
Visual Site Inspection
February 12, 1990

PRELIMINARY INFORMATION NEEDS FOR
RCRA FACILITY ASSESSMENT

1. Identify past or present SWMUs which have not been identified in the VSI Agenda. Include a brief description of wastes managed in these units, the period of operation, unit dimensions, location, operating information, release controls, and history of releases. Units to identify include, but are not limited to, the following:
 - Aboveground and underground waste storage tanks.
 - Abandoned storage tanks.
 - Waste storage units for solid and hazardous wastes which fall under the 90-day RCRA exemption.
 - All waste handling areas and associated activities including loading zones, transfer area, and waste accumulations areas.
 - All former waste treatment units or disposal areas.
2. Provide process flow diagrams and descriptions of facility procedures, specifically those procedures used to manage waste.
3. Provide a history of land and building use at the site, including:
 - Land ownership and use prior to acquisition by UCAR.
 - Any changes in facility operations, particularly those which resulted in changes in the wastes generated on-site.
4. Identify any areas of past spills or leaks and provide a description of any clean-up actions taken.
5. Provide any available information characterizing ground water (depth, flow direction, quality) and local geology.
6. Provide origin of plating wastes (F006 and F007) reportedly handled at the facility.

ATTACHMENT III (continued)

UCAR Carbon Co., Inc.
12900 Snow Road
Parma, Ohio 44101
Visual Site Inspection
February 12, 1990

7. Maps included in the file material indicate two locations for the Hazardous Waste Container Storage Area No. 1 (SWMU 1). Indicate whether this unit has ever changed locations.
8. Provide the status of closure of the Hazardous Waste Container Storage Areas (SWMUs 1 through 3).

Kearney/Centaur Division
A.T. Kearney, Inc.
Three Lagoon Drive
Redwood City, California 94065
415 598 9390

Management
Consultants

January 31, 1990

RECEIVED
FEB 07 1990

Mr. Dave Mieskowski
Manager, Health, Safety, and Environmental Protection
Union Carbide Corp.
UCAR Carbon Company, Inc.
P.O. Box 6116
Cleveland, OH 44101

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

ATKEARNEY


Reference: EPA Contract No. 68-W9-0040; Work Assignment
No. R05-05-07; UCAR Carbon Company, Inc.,
Parma, Ohio; EPA ID No. OHD003926748; Visual
Site Inspection Agenda Letter

Dear Mr. Mieskowski:

This letter is to confirm that a visual site inspection (VSI) is to be conducted at the UCAR Carbon Company, Inc. by the Resource Conservation and Recovery Act (RCRA) implementation assistance contractor, A.T. Kearney, Inc. The VSI has been scheduled for February 12, 1990. Your cooperation in admitting and assisting the Kearney Team during the VSI is appreciated. The contractor personnel may be accompanied by Ohio Environmental Protection Agency representatives and by U.S. Environmental Protection Agency representatives as referenced in the letter sent by EPA on January 22, 1990.

Copies of the VSI Agenda, Attachment I, the Preliminary List of SWMUs and AOCs, Attachment II, and the Preliminary Information Needs, Attachment III, are enclosed. We will appreciate your having information available at the time of the VSI addressing these items. Should you have any questions regarding this letter, please contact me at (415) 598-9390.

Sincerely,


Grover S. Buhr
Work Assignment Manager

Attachment

cc: L. Pierard, EPA, Region V bcc: B. Orenstein, EPA Region V
G. Taylor, OEPA F. Norling, EPA Region V
A. Anderson
A. Glazer
L. Poe
S. Palmer
L. Sherman
A. Williams (w/o enc.)
P. Martz (w/o enc.)

0612B-RC

ATTACHMENT I

RCRA FACILITY ASSESSMENT
PROPOSED VISUAL SITE INSPECTION AGENDA

FACILITY: UCAR Carbon Company, Inc.
12900 Snow Road
Parma, Ohio 44101

EPA I.D. NO.: OHD003926748

FACILITY CONTACT: Dave Mieskowski;
Manager - Health, Safety, and
Environmental Protection
(216) 676-2228

DATE OF INSPECTION: February 12, 1990

PERSONNEL: Grover Buhr, Kearney/Centaur
(415) 598-9390
Scott Palmer, A.T. Kearney, Inc.
(415) 595-4300

PURPOSE OF INSPECTION:

The Hazardous and Solid Waste Amendments of 1984 (HSWA) broaden the Scope of the Environmental Protection Agency's (EPA's) authority under the Resource Conservation and Recovery Act (RCRA) by requiring corrective action for releases of hazardous wastes and constituents at facilities that manage hazardous wastes. The RCRA Facility Assessment (RFA) is conducted to evaluate the potential for releases to the environment and the need for corrective action. The corrective action authority extends to all solid waste management units (SWMUs) and other areas of concern (AOCs) which may be potential sources of releases at the facility.

The RFA includes a desk-top preliminary review (PR) of available file information, a visual site inspection (VSI) of the facility, and, if necessary, a sampling visit. Based on the review of available data for this facility, it has been determined that a VSI is necessary. The purpose of the VSI is:

1. To collect all available relevant information on solid waste management practices that have been used on the site;
2. To gain first-hand information regarding the identification, location, construction, configuration, function served, method of operation, and condition of each SWMU and AOC;

ATTACHMENT I (continued)

UCAR Carbon Co., Inc.
12900 Snow Road
Parma, Ohio 44101
Visual Site Inspection
February 12, 1990

3. To confirm, by visual inspection and discussion with facility representatives, information collected during the PR;
4. To survey the site for additional SWMUs and AOCs not identified in the review of file material;
5. To identify potential sample points for possible future sampling activities;
6. To review the site information and collect additional information to address the information needs identified during the PR; and
7. To take photographs of all SWMUs and other AOCs.

INSPECTION ORGANIZATION

EPA's Contractor, A.T. Kearney, will send a two-member field team to perform the VSI. Due to the size of the facility and the tentative number of SWMUs and AOCs identified, a one-day inspection is anticipated. The team will inspect all past and current solid waste and hazardous waste handling, storage, treatment, and disposal areas on site. Outdoor and indoor waste generation, collection, and accumulation areas in laboratory facilities will be inspected as necessary to acquire a complete understanding of waste streams, waste flows, and waste handling procedures. The team will also identify, inspect, and document potential pathways for release of hazardous constituents into the environment. Facility staff will be interviewed to develop a better understanding of past and current waste management practices. Any available environmental monitoring or sampling data for characterization of the soils, ground water, surface water (or runoff), and air quality at the site, will also be reviewed.

The overall rationale of this inspection is to enable the team to trace the waste flow through the entire facility from the points of generation to ultimate disposal. Attachment I presents the VSI agenda which has been prepared based on the preliminary file review. Some adjustments to the proposed agenda may be necessary to accommodate facility staff,

ATTACHMENT I (continued)

UCAR Carbon Co., Inc.
12900 Snow Road
Parma, Ohio 44101
Visual Site Inspection
February 12, 1990

operational constraints, or unforeseen conditions. This proposed schedule will be reviewed during the introductory meeting and adjusted, if necessary, at that time. The VSI field team will make every reasonable effort to conform to the facility's normal hours of operation.

Attachment II presents the list of potential SWMUs and AOCs which was developed based on the preliminary file review. If any units or areas no longer exist, the locations of the former units and areas should be identified by facility representatives during the VSI. Likewise, any other units or areas where solid wastes, both hazardous and nonhazardous, are treated, stored, or disposed (and areas where potentially hazardous materials are stored, handled, and transferred) should be identified by facility representatives during the VSI.

Attachment III presents the List of Additional Information Needs to be discussed in the introductory meeting at the VSI.

ATTACHMENT I (continued)

UCAR Carbon Co., Inc.
12900 Snow Road
Parma, Ohio 44101
Visual Site Inspection
February 12, 1990

INSPECTION SCHEDULE

| <u>Time</u> | <u>Activity</u> |
|-----------------------|---|
| 8:30 a.m. - 9:30 a.m. | Introductory meeting. <ul style="list-style-type: none">-- Provide introductions and clarify objectives of VSI.-- Discuss current site activities and the waste streams and methods of handling associated with each.-- Discuss agenda, safety and health considerations and general plan for visiting all areas.-- Fill in information gaps, including clarification of active and inactive units and status of all units which have locations listed as unknown. Discuss and gather data/information provided in response to the list of additional information needs. |
| 9:30 a.m. - Noon | Begin tour of the facility. <ul style="list-style-type: none">-- Start inspection of SWMUs and AOCs in the west half of the site.-- Tour (briefly) laboratories and associated areas in the west half of the site, focusing on waste generation points. |
| Noon - 1:00 p.m. | Lunch Break |

ATTACHMENT I (continued)

UCAR Carbon Co., Inc.
12900 Snow Road
Parma, Ohio 44101
Visual Site Inspection
February 12, 1990

1:00 p.m. - 4:00 p.m.

Continue tour of the facility.

- Complete inspection of SWMUs and AOCs throughout the site.
- Complete tour of laboratories and associated areas throughout the site.

4:00 p.m. - 5:00 p.m.

Closing meeting with facility representatives.

- Discuss information needs identified during VSI.
- Obtain any additional data or information required/available.

ATTACHMENT II

UCAR Carbon Co., Inc.
12900 Snow Road
Parma, Ohio 44101
Visual Site Inspection
February 12, 1990

PRELIMINARY LIST OF SWMUs and AOCs

SWMUs

- ✓1. Hazardous Waste Container Storage Area No. 1*
- ✓2. Hazardous Waste Container Storage Area No. 2
- ✓3. Hazardous Waste Container Storage Area No. 3
- ✓4. Former Waste Chemical Handling Area
- ✓5. Solid Waste Dumpster
- ✓6. Lab Chemical Disposal Drain
- 7. Underground Sewer Piping
- 8. Sump No. 1
- 9. Sump No. 2

AOCs

- A. Loading/Unloading Areas
- B. Underground Fuel Oil Storage Tanks (4)
- C. Underground Gasoline Storage Tank
- D. PCB Transformers (3)
- E. PCB Capacitor

* RCRA-regulated.

ATTACHMENT III

UCAR Carbon Co., Inc.
12900 Snow Road
Parma, Ohio 44101
Visual Site Inspection
February 12, 1990

PRELIMINARY INFORMATION NEEDS FOR
RCRA FACILITY ASSESSMENT

1. Identify past or present SWMUs which have not been identified in the VSI Agenda. Include a brief description of wastes managed in these units, the period of operation, unit dimensions, location, operating information, release controls, and history of releases. Units to identify include, but are not limited to, the following:
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 - All former waste treatment units or disposal areas.
2. Provide process flow diagrams and descriptions of facility procedures, specifically those procedures used to manage waste.
3. Provide a history of land and building use at the site, including:
 - Land ownership and use prior to acquisition by UCAR.
 - Any changes in facility operations, particularly those which resulted in changes in the wastes generated on-site.
4. Identify any areas of past spills or leaks and provide a description of any clean-up actions taken.
5. Provide any available information characterizing ground water (depth, flow direction, quality) and local geology.
6. Provide origin of plating wastes (F006 and F007) reportedly handled at the facility.

ATTACHMENT III (continued)

UCAR Carbon Co., Inc.
12900 Snow Road
Parma, Ohio 44101
Visual Site Inspection
February 12, 1990

7. Maps included in the file material indicate two locations for the Hazardous Waste Container Storage Area No. 1 (SWMU 1). Indicate whether this unit has ever changed locations.
8. Provide the status of closure of the Hazardous Waste Container Storage Areas (SWMUs 1 through 3).



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

**230 SOUTH DEARBORN ST.
CHICAGO, ILLINOIS 60604**

REPLY TO THE ATTENTION OF:

5HR-13

JAN 29 1990

Mr. D.A. Mieskowski
UCAR Carbon Co., Inc.
Union Carbide Corp.
P.O. Box 6116
Cleveland, Ohio 44101

Reference:

Visual Site Inspection
UCAR Carbon Co., Inc.
EPA I.D. No. OHD003926748

Dear Mr. Mieskowski:

The United State Environmental Protection Agency (U.S. EPA) Region V has requested A.T. Kearney, Inc., U.S. EPA's RCRA Implementation Contractor, to conduct a RCRA Facility Assessment (RFA) at the UCAR Carbon Co., Inc. Under the 1984 Hazardous and Solid Waste Amendments (HSWA), a RCRA Facility Assessment is required of the UCAR Carbon Co., Inc. facility. The assessment requires identification and systematic review of all solid waste streams at the facility. The objective of this assessment is to determine whether or not releases of hazardous wastes or hazardous constituents have occurred or are occurring at the site which require further investigation. This analysis will provide information to establish priorities for subsequent remedial investigations.

An integral part of this assessment is a visual site inspection (VSI) of your facility to verify the location of all "solid waste management units" (SWMUs) and to make a cursory determination of their condition by visual observation. The VSI supplements and updates data gathered during a preliminary file review. During this site visit, no samples will be taken. A future sampling visit (at the U.S. EPA's expense), to ascertain if releases of hazardous waste or constituents have occurred, may be required at a later date.

Mr. D.A. Mieskowski
Page 2

Assistance of some of your personnel may be required in reviewing solid waste flow(s) or previous disposal practices. This site visit is to provide a technical understanding of the present and past waste flows and handling, treatment, storage, and disposal practices. Photographs of each SWMU are to be taken to document the condition of the units at the facility and the waste management procedures used.

The VSI has been scheduled for February 12 and 13, 1990. The A.T. Kearney inspection personnel will be accompanied by a U.S. EPA Region V representative. Your cooperation in admitting and assisting them while on site is appreciated.

In preparation for the VSI, the inspection personnel are required to identify any potentially hazardous conditions likely to be encountered at the site during performance of the VSI and to prepare a safety plan that deals with the hazards, if necessary. You will be contacted by an A.T. Kearney Health and Safety Officer by telephone in the near future to obtain specific information on the level(s) of personal protection required and materials handled in each area of your facility.

The proposed VSI agenda and information needs will be sent to you prior to the VSI. Should you have questions regarding this letter, please contact Ms. Francine Norling of my staff at (312) 886-6198 or Mr. Grover Buhr of Kearney/Centaur at (415) 598-9390. A copy of the PR/VSI, excluding Section IV, Conclusions and Suggested Further Actions, may be made available in the future by contacting Ms. Francine Norling.

Sincerely,



Lisa A. Pierard
Ohio Permitting Section

cc: Ed Kitchen, OEPA



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

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Union Carbide Corp.
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Mr. D.A. Mieskowski

Page 2

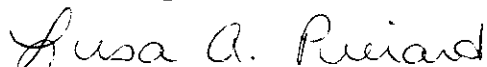
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Sincerely,



Lisa A. Pierard
Ohio Permitting Section

cc: Ed Kitchen, OEPA

0361S-RC

A.T. Kearney, Inc.
222 South Riverside Plaza
Chicago, Illinois 60606
312 648 0111
Facsimile 312 648 1939-2302

Management
Consultants

RECEIVED
JAN 22 1990
AT KEARNEY

January 22, 1990

Mr. Bernie Orenstein
Regional Project Officer
U.S. Environmental Protection Agency
Region V
230 South Dearborn
Chicago, Illinois 60604

OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

Reference: EPA Contract No. 68-W9-0040; Work Assignment
No. R05-05-07; UCAR Carbon Co., Inc., Parma,
Ohio; EPA I.D. No. OHD003926748; Visual Site
Inspection Notification Deliverable

Dear Mr. Orenstein:

Enclosed please find the Visual Site Inspection (VSI)
Notification Letter for the UCAR Carbon Co., Inc. The
VSI is tentatively scheduled for February 12 and 13,
1990. Because of the tight schedule, we wish the
notification letter to be sent immediately, although we
have not prepared the work plan. We have discussed this
with Francine Norling.

The work plan will be sent to you next week after the
file review. At that time, we will be able to better
determine the level of effort required for this project.
The VSI agenda and information needs will also follow.

Should you have any questions or require additional
information, please feel free to contact me.

Sincerely,

Pat Manty
for

Grover Buhr
Work Assignment Manager

Enclosure

cc: F. Norling, EPA Region V
A. Anderson
A. Glazer
L. Poe
A. Williams (w/o attachment)

0606B-RC

Mr. D.A. Mieskowski
Page 2

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Sincerely,

Lisa A. Pierard
Ohio Permitting Section

cc: Ed Kitchen, OEPA

!bcc: B. Orenstein, EPA, Region V!
!K. Lee, RPB/OH!
!G. Buhr, Kearney/Centaur!
!A. Anderson, ATK!

0361S-RC



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

230 SOUTH DEARBORN ST.

CHICAGO, ILLINOIS 60604

REPLY TO THE ATTENTION OF:

5HR-13

Mr. D.A. Mieskowski
UCAR Carbon Co., Inc.
Union Carbide Corp.
12900 Snow Road
Parma, Ohio 44130

Reference:

Visual Site Inspection
UCAR Carbon Co., Inc.
EPA I.D. No. OHD003926748

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Mr. D.A. Mieskowski
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0361S-RC

Mr. D.A. Mieskowski
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Lisa A. Pierard
Ohio Permitting Section

cc: Ed Kitchen, OEPA

!bcc: B. Orenstein, EPA, Region V!
!K. Lee, RPB/OH!
!G. Buhr, Kearney/Centaur!
!A. Anderson, ATK!

0361S-RC



UNION CARBIDE CORPORATION

12900 SNOW ROAD, PARMA, OHIO

AREA CODE: 216 676-2000

MAIL ADDRESS: P. O. BOX 6116, CLEVELAND, OH 44101

Parma Technical Center

Carbon Products Division

March 11, 1986

RCRA Activities
Region V
P. O. Box A3587
Attn: ATKJG
Chicago, IL 60690

Gentlemen:

Please find attached the Certification Regarding Potential Releases from Solid Waste Management Units requested in David A. Stringham's letter of January 31, 1986.

If there are any questions, please contact D. A. Mieskowski, Senior Administrator, Health, Safety, and Environment, at (216) 676-2228.

Sincerely,

A handwritten signature in blue ink that reads "Paul D. Coulter".

Paul D. Coulter

PDC/dml/1770A

Attachment

CERTIFICATION REGARDING POTENTIAL RELEASES FROM
SOLID WASTE MANAGEMENT UNITS

FACILITY NAME: Union Carbide Corporation, Parma Technical Center
EPA I.D. NUMBER: OHD 003926748
LOCATION CITY: Parma
STATE: Ohio

1. Are there any of the following solid waste management units (existing or closed) at your facility? NOTE - DO NOT INCLUDE HAZARDOUS WASTE UNITS CURRENTLY SHOWN IN YOUR PART A APPLICATION

| | YES | NO |
|---|---------------|----------|
| • Landfill | <u> </u> | <u>X</u> |
| • Surface Impoundment | <u> </u> | <u>X</u> |
| • Land Farm | <u> </u> | <u>X</u> |
| • Waste Pile | <u> </u> | <u>X</u> |
| • Incinerator | <u> </u> | <u>X</u> |
| • Storage Tank (Above Ground) | <u> </u> | <u>X</u> |
| • Storage Tank (Underground) | <u> </u> | <u>X</u> |
| • Container Storage Area | <u> </u> | <u>X</u> |
| • Injection Wells | <u> </u> | <u>X</u> |
| • Wastewater Treatment Units | <u> </u> | <u>X</u> |
| • Transfer Stations | <u> </u> | <u>X</u> |
| • Waste Recycling Operations | <u> </u> | <u>X</u> |
| • Waste Treatment, Detoxification | <u> </u> | <u>X</u> |
| • Other <u> </u> | <u> </u> | <u>X</u> |

2. If there are "Yes" answers to any of the items in Number 1 above, please provide a description of the wastes that were stored, treated or disposed of in each unit. In particular, please focus on whether or not the wastes would be considered as hazardous wastes or hazardous constituents under RCRA. Also include any available data on quantities or volume of wastes disposed of and the dates of disposal. Please also provide a description of each unit and include capacity, dimensions and location at facility. Provide a site plan if available.

N/A

NOTE: Hazardous wastes are those identified in 40 CFR 261. Hazardous constituents are those listed in Appendix VIII of 40 CFR Part 261.

3. For the units noted in Number 1 above and also those hazardous waste units in your Part A application, please describe for each unit any data available on any prior or current releases of hazardous wastes or constituents to the environment that may have occurred in the past or may still be occurring.

Please provide the following information

- a. Date of release
- b. Type of waste released
- c. Quantity or volume of waste released
- d. Describe nature of release (i.e., spill, overflow, ruptured pipe or tank, etc.)

N/A

4. In regard to the prior or continuing releases described in Number 3 above, please provide (for each unit) any analytical data that may be available which would describe the nature and extent of environmental contamination that exists as a result of such releases. Please focus on concentrations of hazardous wastes or constituents present in contaminated soil or groundwater.

N/A

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the submittal is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (42 U.S.C. 6902 et seq. and 40 CFR 270.11(d))

Paul D. Coulter
Director of Technology

Typed Name and Title

Paul D. Coulter

Signature

March 11, 1986

Date